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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

Rulemaking Comments for Chapter 128, Advanced Clean Trucks Program

Dear Ms. Cayting,

I write to you to share my facts and feelings as a Maine resident and Maine business owner about the Advanced Clean Truck Program. As I am originally a farm boy from Vermont and came here to go to school, I truly have a love for the outdoors and responsibility to protecting it. My hobbies and favorite getaways still involve being outdoors. So, I am certainly a supporter of protecting our environment and making reasonable changes to advance the protection of our outdoors. However, as a business owner that sells vehicles that fit in every one of these classes affected including school buses, I see multiple problems with Advanced Clean Truck Program, and I don't believe it accomplishes what it is intended to do. After hours of dealer calls and fellow dealers talking about the results and performance of this product in states such as California, and the failures and breakdowns and the fire risk they present, it is evident that this is not the answer for Maine.

I personally attended the public hearing on August 17th at the Augusta Civic Center and listened to what was said as to why Maine needs this rule; we must force the Manufacturer to build these vehicles. Manufactures are and have been spending trillions of dollars on getting vehicles designed and built that will meet zero emissions and be able to do the required job and meet the range required. Currently there is in place a federal emission standard for 2027 of .02 on medium and heavy-duty trucks. This is a huge reduction to current standards. They know to meet this level; they will have to get multiple vehicles available at zero emissions. They will certainly get there, but it will not be with just one engine choice. They are currently developing a hydrogen fuel cell engine, natural gas engine, EV and believe they can meet requirements with an ICE engine. So why would we in Maine pass a mandate ruling that we invest billions on infrastructure and chargers, then have the industry come out with a totally different product that performs better than what the Advanced Clean Truck Program is mandating. There was a lot of conversation about being able to buy credits to offset where they fall short, that is not as easy as it was presented. First, that is very expensive and will be passed on to the public in cost. Secondly, there is not the number available that is needed. I ask if we had everything at .02 emissions today, would this rule even be on the table. We need to allow the equipment in place and

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the new product to come, time to do their job. I would suggest we offer credits to take the old emissions off the road. This would lower our emissions very quickly.

The grid and charging stations are the big piece of this rule that is very concerning and not at a level able to support this bill. I have been working on this at my own dealerships for two years now and have spent \$200,000 dollars on infrastructure and chargers. I still don't have one charger that I need, my 50KW is still not operable and I'm told this is already outdated and I will need to buy a 100KW to charge at the rate needed. I have been told if my fellow dealers in Bangor run their chargers at the same time it will take out the Hogan Road. The cost was explained as cheaper than diesel to charge an EV, maybe if you charged at your home. Public charges are now more expensive than gas or diesel to plug into, and in the trucking industry, trucks don't always go home at the end of day. Last week two battery companies filed for bankruptcy making it even harder for them to get batteries and that will cause further delays.

I listened to testimony that climate doesn't matter, this is simply not true. I have asked every engineer I have spoken with about climate and terrain and its effects on batteries. They have all said it loses at LEAST 40 to 50 percent of its charge in freezing temperatures. They did not say that means 30 below, freezing 32 is degrees or below. Which certainly cuts their range by a lot. Eighty five percent of my class 7 and 8 sales are vocational trucks. These are trucks that haul very heavy loads or carry very heavy loads. The ability for these trucks to be EV is not something the manufacturers are doing. They don't have frame rail space for batteries and require substantial torque and horsepower to haul these loads. This is why there are going to be other engine options.

This situation will absolutely be turned into the dealer's problem, we are on an allotment system for inventory. For example, if we are allocated 100 trucks and 15% must be EV'S. Then, if we are only able to sell 7 EV'S, we will only be able to get 42 diesel trucks. Effectively cutting our inventory in half. They will drastically hurt the dealer and could put them out of business. This bill keeps being explained as the manufacturers' problem, that is not true it is going to be the dealer's problem. The reason it is the dealer's problem is this, there is nothing in place to stop the consumer from leaving Maine to buy any type of truck they want then bringing it back to Maine to register. If this is truly about lowering emissions in Maine, why is this? This is why this needs to be a regulation through registration bill.

In conclusion, they are 2-3 times more expensive than gas or diesel models, they are very heavy and will break Maine roads down much faster, they aren't cheaper to run or own. Let the businesses that can afford them and have an application for them buy them. Forcing the rule will do the opposite of its intention and people will drive their older vehicles longer. This is not good for Maine people.

I truly hope after you consider the facts and the effects of this rule you will understand this Rule is not the answer for Maine.

If you consider signing this rule these are some points, I feel need to be added.

- 1.) Power companies and chargers must have sufficient power and chargers in place for the total state at a level equal to the sales percentage dealers are required to sell to and provided evidence of doing so 12 months prior do dealers being required to sell the mandated levels of this product. How can you ask dealers to be forced to sell a product that can't be charged after purchase?
- 2.) The percentage of 15 percent is too high, to go from 0 to 15 percent in one year is impossible. It should start at 5 percent and go up 1 percent each year after.
- 3.) I believe the timeline is short.
- 4.) Must be regulation through registration. You can't allow everyone to go buy anything they want and bring it back and register here if this is truly about helping Maines environment.
- 5.) I believe this should be a state emission level standard not a rule for some.

In closing, I am for protecting our environment and having a lower emission standard. I don't support this bill because it forces one engine choice and it cannot perform all jobs, we need it to do, there are going to be multiple options coming. So, we invest billions of MAINE dollars in chargers and infrastructure and then to realize they have a hydrogen fuel cell, natural gas, or ICE engine that performs better and costs less. Then what happens to our infrastructure? Is this about helping our environment, if so, why is forcing an option? Someone asked how this is any different than when we changed from horses to cars and trucks? Here is the difference, no one ever mandated you had to buy a certain truck. They were adopted as they were able to do the job better, horses were around for a long time. And think about how many manufacturers never made it, maybe this happens to EV because there is a better option to get to zero emissions. It happened in its own time frame and with the best options. I don't believe this helps Maine people, its economy, or its environment. I feel we will have the emission levels needed by meeting the requirements that are already coming.

Thank you for your time and consideration.

Randy Hutchins