

## Breton, Mary B

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**From:** Paul Curtis <pcurtis306@gmail.com>  
**Sent:** Sunday, August 27, 2023 3:15 PM  
**To:** DEP Rule Comments  
**Subject:** Comment on 06-096 C.M.R. Chapter 128: Advanced Clean Truck Program

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To whom it may concern,

Maine DEP should not adopt California's Advanced Clean Truck regulation to force the sale of electric medium and heavy-duty vehicles greater than 8,500-pound GVWR.

Based on my review of this rule the Maine DEP and the rules proponents do not appreciate the implications and broad sweeping impact that this rule will have on the people of the State of Maine. This is evident by the type of rule being denoted as "Routine Technical". This rule is anything but routine. The rule is a broad sweeping initiative to interfere with a free-market economy and force the adoption of electric vehicles by monetarily penalizing small businesses. It is a fact that this rule will ultimately only penalize small businesses for one of two reasons. The companies will be forced to adopt more expensive electric vehicles resulting in the need for additional charging infrastructure which will likely result in numerous electrical line upgrades and in some cases the need to construct small substations to charge the trucks. There will be cost to adopt new maintenance equipment and retrain technicians to work on zero-emission vehicles. There will also be numerous occasions of lost time as a result of charging and other maintenance issues that will directly affect productivity but are difficult to monetarily quantify. Alternatively small businesses who do not choose to purchase electric vehicles because of the lack of supporting infrastructure and limitations of the vehicles themselves will be penalized through artificially higher cost created by the sales quota and credit system.

Adopting California regulations would require Maine small business owners across multiple industries that operate vehicles the size of 3/4 ton pickup trucks, such as an F-250, and larger, to incur additional operating cost that will have a substantial and significant financial impact to their business which will be passed along to the end consumer, which includes the people of the State of Maine. Adopting the California standard will increase the cost of State or local municipality infrastructure projects because the companies that construct these projects will be directly affected by this rule. The small businesses in Maine that will be affected by this rule include but are not limited to excavation companies, concrete companies, freight companies, lobstering industry, fishing industry, waste management and recycling companies, landscape companies, property management companies, logging companies, municipalities, school districts, bussing companies, etc.

Sincerely,

Paul Curtis, Licensed Professional Engineer, M.S. UMO Engineering