

## Breton, Mary B

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**From:** trian@twc.com  
**Sent:** Monday, August 14, 2023 8:19 AM  
**To:** DEP Rule Comments  
**Subject:** Comments in opposition to Chapter 128: Advanced Clean Trucks Program

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To members of the Bureau of Environmental Protection and Ms. Lynne Cayting:

My name is Peter Triandafillou and I am a retired forester living in Orono, Maine. I am submitting this letter in opposition to adoption of California's Advanced Clean Truck (ACT) rules as presented on the DEP website.

There are several reasons not to adopt EV and truck mandates. Maine is not anything like California. Compared to California, Maine's economy is very small, and we are much less wealthy. It is highly unlikely policies that may or may not work for California will work for Maine. Maine has a dispersed and rural population and work environment. We need heavy trucks to move logs and finished forest products to markets over long distances in remote areas. Is it reasonable to believe that we can efficiently move thousands of tons of product in electric trucks in midwinter? Where would a driver charge a truck in remote areas? The technology does not yet exist.

We should promote market-based solutions rather than mandate certain technologies. There may be more effective and efficient solutions to truck carbon emissions. Converting half the truck fleet to hybrid platforms, natural gas, or hydrogen fuel cells may be more effective than converting a smaller portion of the fleet to EV trucks. We do not know the answer to that question at this time, but by adopting these rules, we will have effectively forced the answer. I don't think that makes much sense.

Like much of the country, Maine's power grid is fragile. Electrifying the truck and automobile fleets is like adding hundreds of thousands of homes on the grid. Nowhere in these proposals do I see concrete plans for the billions of dollars of investment needed to upgrade and expand our grid. Without such an investment, mandating EV and truck standards is a fantasy.

Maine is already at a competitive disadvantage to other states with similar natural resource based economies. The cost of doing business in Maine is very high and getting higher. In particular, the cost of energy and transportation in Maine is already uncompetitively high. Adopting the California truck rules will only make this situation worse. We do not have the wealth to blindly follow California's lead. Adopting these rules will only drive more business and employment out of Maine.

This may be a comment borne of ignorance, but I notice on your website that the proposed rules are "Routine Technical." Mandating the electrification of our heavy truck fleet is anything but routine and technical. This is a hugely substantive proposal.

I urge you to reject adoption of the ACT rules. We are much better served by exploring market based solutions that accomplish similar goals at lower cost and without upending our economy and power grid.

Thank you for your time.

Peter Triandafillou