



Powers Transport, LLC.

P.O. Box 460
Clinton, Maine 04927
207-426-6031

August 22, 2023

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,

On behalf of Powers Transport LLC, we would like to express our concerns about the proposed clean trucks program and the impact it would have on our company. First, let me tell you a little about our company. We are an over the road trucking company based out of central Maine. We have 18 trucks consisting of Freightliner Gliders, Peterbilt's and Kenworth's. These trucks have very low emissions and 90 percent of them are all 2020 or newer. In fact, our gliders were recently tested by the Connecticut DOT and had less than 1% emissions. We haul both vans, flatbeds, and step decks. Many of our loads weigh upwards of 40,000 to 48,000 pounds. All our trucks have APU units to help limit idle time and decrease our emissions footprint. We understand the need to reduce emissions and to save our clean air and feel that we are doing our best to do so.

We do not believe that the proposed Advanced Clean Trucks Program like California adopted, is the right call for Maine. We are not a huge state like California, nor do we have the same amount of industry, people, ports of entry and number of vehicles as California. Smog is not an issue in Maine like it is in California and we do not have all the wildfires that add to poor air quality. To do so would be like comparing apples to oranges, two completely different fruits.

We feel this plan would be bad for Maine for the following reasons:

- This plan will create undo financial hardships on all trucking companies and manufacturers in Maine and put many out of business.
- Many trucking companies would boycott Maine as they do California. This in turn would mean manufacturers would have a hard time shipping and receiving their products causing more financial hardship in an already fragile state.
- The newer trucks that are in service today already come for the most part with low emissions. Why should companies be forced into using electric trucks or go out of business.
- Affordability, are people going to be reimbursed for the trucks they already have? What about those that can't afford to purchase these new ZEV trucks? Are we just going to put them on the unemployment line?
- These new EV trucks are not equipped to handle all the necessary tools etc that we need to work.
- Maine has severe weather and these EV trucks have not proven themselves to be a good option in snow and ice etc.
- Maine is not even close to having the EV charging stations necessary to support such a change, they don't even have enough truck stops.
- It takes two EV trucks to move the same amount of freight as one diesel truck. If that isn't reason enough, you would need two drivers for those trucks, and everyone knows that drivers are in short supply.

There are many reasons as to why this clean energy act should not be adopted here in Maine. These are just a few of them. It is my hope that you will take the time to review and understand the impact that this will have on those that live in this state. I have been a business owner for many years and the last few years have been the most difficult financially. I have still managed to keep my equipment updated, maintained and compliant but my profit margin has definitely taken a hit. I have priced these new EV trucks and for the added purchase price of each unit and the decrease in revenue that loads are paying this is not a financially sound investment.

Please vote to not allow this to pass!

Sincerely,

Michael Powers

Powers Transport LLC