

Breton, Mary B

From: Ryan Daigle <rdaigle@flmaine.com>
Sent: Monday, August 28, 2023 1:52 PM
To: DEP Rule Comments
Subject: Please Vote Against California's Advanced Clean Trucks Rule

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Dear Air Quality Bureau Cayting,

Good Afternoon,

As a Director of Sales for Maine's largest Class 8 Truck Dealer, Freightliner & Western Star of Maine, I would like to voice our opposition to this proposed ruling. While Electric Trucks potentially have a place in the market, in Maine it will always remain a very small portion of our business and will never attain the goals sought in this ruling. For one, there are only 2 types of trucks I can order currently, a straight truck, and a tractor. These unit can only be used to haul general freight, be it with a box van for furniture delivery or a van trailer hauling goods. The issue we have is that the majority of Maine's trucking is specialized vocational hauling. While you may see plenty of van trailers and box trucks up and down the highway, the majority of those are not owned by Maine businesses, only business who deliver to Maine. Our customer base is heavy into construction, logging, fuel delivery, building materials, and plowing, and heavy haul to name a few. There are currently no offering for electric trucks in these capacities, nor will there, as they cannot engineer a suitable truck to hold the weight of the battery needed for these applications. Other alternative energys are being pursued for these applications. Of our current order board, which is approximately 400 trucks, only 10-15% could be converted to electric with the available models. That percentage will not increase as time goes on, and will most likely decrease, as general freight companies are the most prone to acquisition by out of state companies. The other issue we have is the performance, or lack there of, for electric trucks. Currently, Maine has ZERO in operation, no place to charge them as that is a whole different charger than cars, and Daimler Trucks North America, which has 40% market share, has ZERO on order in the entirety of the Northeast. We also have ZERO demand from our customers currently, with most who do inquire running the other way when the price is mentioned.

The price of 250-\$300,000 for a truck and \$350-400,000 for a tractor, plus 12% FET and 5.5% sales tax would add another \$40-70K, which is impossible for most of our trucking population to afford. That's an average of 2.5 times the cost of current units. If we as a dealer are forced to stock units, which is most likely the case if this goes through, then we will see a floorplan cost of \$1,200-2,000 per unit per month, which adds up quite quickly when trucks dont sell. The low ranges on the units from 250-300 miles on a full charge is an issue with our very rural state. The range is also cut in half with cold weather, nevermind any of the attachments that our vocational trucks need to operate with.

The overriding issue here is that demand cannot be created if the technology isn't there. These are businesses that would have to make these purchases, and if the business case is there, they will adopt it. There is zero demand currently and very little interest from any customers due to the limits on application use which says a lot about trying to get 15% adoption in 3 years.

Sincerely,

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