

Breton, Mary B

From: Randy Mace <randy.mace.0363a@advocacy.online>
Sent: Monday, August 28, 2023 3:14 PM
To: DEP Rule Comments
Subject: Please Oppose Proposed Rule 128 - Electric Vehicle Sales Mandates on Trucks

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Lynne Cayting,

I am writing to you today to urge you to oppose the proposed rule to mandate the sale of medium and heavy-duty electric trucks in Maine. I support voluntary choice by our customers of vehicles that meet their needs. This plan is costly, unrealistic, and requires dealers to abandon our longstanding principle of finding vehicles that best suit the needs of our customers.

This plan is burdensome and costly to dealers. The California rules define "sale" in such a way as to mean the transaction between the manufacturer and the dealership, not the purchase by an ultimate user. Any penalties assessed would fall on the manufacturers. In an effort to avoid penalties, manufacturers will act to ensure a sufficient mix of EVs and ICEs are on dealership lots. This means dealerships will have vehicles in stock to meet manufacturer obligations, not necessarily the vehicles customers want or need. Dealerships will be left with unsold inventory for which they are paying interest to a financing source, which is not only burdensome but incredibly costly.

Proposed Rule 128 limits customer choice, requires purchase of vehicles which can cost 2-3 times the price of current comparable vehicles, have significantly lower range of operation between refueling & recharging, need charging station infrastructure different from light-duty vehicles (this infrastructure is currently not available in Maine), and does not address the woefully inadequate electric grid.

Dealerships work to help customers purchase the vehicle that best suits their needs, and we oppose efforts that reduce that choice and burden hardworking Mainers.

Again, please oppose the proposed Rule 128 electric vehicle sales mandates on medium and heavy-duty trucks.

I am very concerned about forcing the MD/HD trucking industry into a mode of operation that does not or will not into the foreseeable future have the charging capacity and transmission infrastructure to support the percentages of ZEV that will be mandated by the adoption of Rule 128. It has been estimated that the passage of this MD/HD mandate will result in an additional 60% generation of electricity, couple this with Gov. Mill's recently announced goal of adding 175,000 additional heat pumps in the State of Maine and the total increase in electricity generation will be 3-4 times what our capacity is currently. Along with the increase in generation capacity, there will need to be a corresponding increase in the electrical grid infrastructure to deliver all of this additional electricity to where it needs to go. Two weeks ago, I was on a call with Versant, the topic was the new rate schedules they are setting up specifically for ZEV charging. When I asked if they had a plan to expand their transmission capability by 4X in the next decade, there was a deafening silence, the bottom line is, there is no plan in place to facilitate either the additional generating capacity nor the additional transmission capabilities that will be needed to facilitate the mandated percentage of ZEV vehicles.. This mandate will ultimately wreak havoc on the Maine economy.

Unfortunately these mandates will have us hurtling headfirst down a road of a "one size fits all" proposed solution to a problem that is anything but a "one size fits all" problem. There are applications where todays ZEV technology works and is viable , however , it is not in the world of commercial trucks with their high GVRW's and extended ranges needed to move goods through out a very rural state such as Maine with virtually no charging capabilities for vehicles of such size.

Another issue that is very pertinent with ZEV commercial trucks operating in the State of Maine , is temperature . Even at the optimal operating temperature of 80 degrees Fahrenheit the range of a commercial truck ZEV is insufficient to operate in all applications in Maine. At 20 degrees Fahrenheit the range is half of what it is at 80 degrees , which would be absolutely impractical for winter operation in Maine.

In closing, I want to emphasize that I am all in favor of reducing greenhouse gasses , however we should do it as the technology and infrastructure are capable of supporting these changes.

We will be making a huge mistake to mandate this technology in applications where it is not ready yet, let's use this technology where it makes sense now and grow it as the technology of it grows.

I urge you to vote against Proposed Rule 128 - Electric Vehicle Sales Mandate on Trucks.

Respectfully Submitted,

Randy Mace

Vice President/General Manager

Whited Truck Centers

Saco, Auburn, Bangor, Presque Isle

Sincerely,

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