

## Townsend, Erle

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**From:** Charles MacPherson <charles.j.macpherson@gmail.com>  
**Sent:** Monday, February 5, 2024 11:35 AM  
**To:** DEP Rule Comments  
**Cc:** Katrina Smith; laurel@laurellibby.com  
**Subject:** Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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I'm writing to express my opposition to this proposed rule.

As was demonstrably proven during the recent cold snap, EV technology is not suitable for cold climates. This is due to basic chemistry.

Both charging and discharging of batteries - regardless of their chemistry - are chemical processes. It is a long-established fact that cold slows down chemical reactions. Cold weather, especially near and sub-zero (F) temperatures have several deleterious effects on EVs:

1. Cold batteries cannot deliver their full energy store until they are warmed.
2. Batteries cannot efficiently charge in cold weather. This [AP report](#) confirms that in some cases in the recent cold snap, cars would not charge at all. Teslas were being towed away en masse.
3. Without an internal combustion engine as a heat source, EVs must further drain batteries to attempt to warm the car's interior, further reducing effective range.
4. EVs use battery power to warm the batteries in cold weather in an attempt to get more energy out of them. This too further reduces the EV's range.

Further, the electrical grid is not able to accommodate the massive increase in load that EV mandates would demand. The grid will require extensive upgrades to handle the new load. It will also require new generating capacity.

If you'll pardon the expression, mandating EVs before the infrastructure is ready to support it is like jumping out of the airplane before you buy your parachute. Mandating a technology in a cold climate that is ill-suited for cold climates is foolhardy.

The free market is capable of deciding on this without a mandate. When a persons life and travels are organized in such a way that an EV makes sense to them, they will buy an EV.

Thanks for reading this comment.

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