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From: Dione Skidgel <D.Skidgel@griffethhonda.com>
Sent: Wednesday, January 31, 2024 12:43 PM
To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program

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I am writing today as I am deeply concerned about **Proposed Chapter 127-A of the Advanced Clean Cars II Program**.

I was born and raised in Northern Aroostook County and have been a lifelong resident. I am a double alum of the University of Maine at Presque Isle and have held the position of Business Development Manager within the Northern Maine automotive industry for over seven years. I am knowledgeable of the opinions of Aroostook's general population, and I am also confident in my competency on the subject at hand.

The Advanced Clean Cars II Program, also known as the *California Rule*, proposing "an increasing percentage of new light-duty vehicle sales to be zero emission vehicles (ZEV) sales each year, starting with 51 percent ZEV sales in model-year 2028, and leading to 82 percent in model-year 2032" is simply **not feasible** for the Northern Maine region.

When I woke up this morning, January 31st of 2024, the temperature was -9 degrees Fahrenheit. *Consumer Reports*¹ stated in 2021 that an unplugged EV's range can decrease by about 20 percent when the temperature drops between 0°-10°F, and it takes longer to recharge than it would in warm weather. AAA found that electric vehicles only lost an average of 12 percent of range when the heater wasn't used compared to the 40 percent drop with heater use.² According to the U.S. Department of Energy³, an EV may have as much as a 41% drop in range as the car expends more energy to heat the inside of the cabin. The cold can also cause the electric battery to become sluggish, meaning it takes more time to accelerate. A 40+ percent drop in range due to heater use is extremely significant in primarily rural areas, as 85.63% of Aroostook County's population is, as stated in the County-level Urban and Rural information for the 2020 Census.⁴ Those who propose driving a vehicle in sub-zero temperatures without using the heater are willfully ignorant of the real-life situation of winter driving in rural Northern Maine. Heater use is necessary to defrost iced-over windshields, which is a safety issue in terms of visibility. However, cold-weather temperatures affecting EV range and performance is only the beginning of my concerns.

As an employee of a new car dealership in Presque Isle, I am concerned about the practicality of having a lot of over 50 percent EV. Less than 10,000 EV were registered in 2023 in the State of Maine, with only 150 of those in Aroostook County. In 2023, the average cost of a new EV⁵ exceeded the median annual income⁶ of a household in Aroostook County. If we are required to fill our lots with product that is unwanted and, in many cases, unaffordable in our region, we have no hope of remaining a profitable business. Where does that leave our employees?

Current infrastructure is also a major concern, whereas there are less than 500 charging locations in the State of Maine that are available to the public driving those 9,500 EV, with approximately 11 of those in Aroostook County to serve the 150 EV registered in that area.

I am hopeful that those voting on this issue will take the ENTIRE state into consideration, rather than looking at the Portland area as a point of reference.

Aroostook County will suffer greatly if this proposed rule goes into effect.

Respectfully,

Dione Skidgel

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1. <https://www.consumerreports.org/hybrids-evs/how-much-do-cold-temperatures-affect-an-evs-driving-range-a5751769461/>
2. <https://www.myev.com/research/ev-101/how-winter-weather-affects-an-electric-car>
3. <https://www.energy.gov/energysaver/fuel-economy-cold-weather>
4. <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html>
5. <https://www.kbb.com/car-advice/how-much-electric-car-cost/>
6. <https://www.census.gov/quickfacts/fact/table/aroostookcountymaine/PST045223>