

## Townsend, Erle

---

**From:** Lee Wylie <leeapple@mac.com>  
**Sent:** Monday, February 5, 2024 10:55 AM  
**To:** DEP Rule Comments  
**Subject:** Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

I want to comment on your upcoming vote to require all EVs by 2028.

After I retired 24 years ago, I moved to Maine. During my career, I worked for General Motors twice—the first time as an Industrial Engineer. In the mid-1980s, I was responsible for designing and implementing the plant floor information technology systems for GM's SATURN. I believe I have a pretty good grasp of the capabilities of the automotive industry.

While EVs may be ready for prime time at some point in the future - they are not now and will not be ready by 2028.

I lived in Castine for 20 years. I would often have to drive to Portland for medical appointments. The round trip between Castine and Portland is 274 miles. The current range for a Tesla Model 3 is 272 miles. On a frigid Maine winter day, using the heater, seat heater, and window defrosting, the range will be significantly reduced. This would require the availability of a charging station at the doctor's office. If you were lucky enough to find a charging station, you would need the ability to monitor the state of the charge. The charging company will charge you idle time if the vehicle is fully charged while you remain in the office.

The current pricing for most EVs is another obstacle for us in Maine. The Tesla Model 3, Tesla's most inexpensive model, sells for between \$47K and \$63K. Purchasing a used EV puts the buyer at risk for an additional battery replacement cost of between \$5K and \$16K.

This rule-making vote was supposed to take place in December. I believe it was canceled due to widespread electrical outages in Maine. Maine is famous for storms taking down parts of the electric grid. It is especially true for the remote and coastal towns at the end of a peninsula. This would necessitate individuals charging their EV from their propane-burning home generator - if they were fortunate enough to have a home generator. We will unlikely see our state-wide electric grid strengthened in time for a 2028 EV mandate.

EVs may be in our future. However, many issues must be solved before mandating EVs for all in Maine.