

Townsend, Erle

From: POG Win <pogmaine@gmail.com>
Sent: Monday, February 5, 2024 11:33 AM
To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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Dear Sir or Madam,

These comments pertain to Chapter 127-A: Advanced Clean Cars II Program. It is my opinion that the Estimated Fiscal Impact statement that was conducted for the proposed rule is incomplete and without merit. For example, the economic impact ignores the increased costs associated with ZEV's, and instead uses language such as, "While there are no direct costs to individuals because of these rules, vehicle manufacturers *may* choose to pass down costs to consumers." [emphasis added]. This statement is erroneous because the proposed rules will have an impact on direct costs. This results because the rules dictate the future new vehicle sales market and, thus, influence the costs to consumers. Further, suggesting that manufacturers *may* choose to pass down the costs to consumers implies that they may not, but the probability that manufacturers do not pass the down the costs is so small as to be non-existent.

Also, the costs to all consumers will increase with increased ZEV use simply because ZEV-users are not paying road use taxes in the form of an on-road fuel tax. The current Maine fuel tax for gasoline and diesel are \$0.30/gallon and \$0.312/gallon, respectively. There is no provision for the lost tax revenue from ZEV sales that would occur from the decrease in gasoline and diesel sales tax revenue. The decrease in fuel tax revenue with ZEVs will be significant, and that cost will be spread to taxpayers in the state of Maine in some form, but this cost is ignored in the fiscal analysis.

Finally, those most hurt by this rule will be those that can least afford it. Low income families will not be able to afford a new EV, and while the fiscal note states that, "For the consumer, ZEV buyers are likely to realize as much as \$7,900[2] in maintenance and operational savings over the first 10 years of ownership", after 10 years, when the EV value has depreciated such that most lower income families can afford to purchase a used ZEVs, batteries will need to be replaced, and that cost is exorbitant.

In short, I respectfully disagree with the conclusion that "...there are no direct costs to individuals because of these rules...". In fact, the rules will have direct costs to residents and taxpayers of Maine, and for that reason, I object to proposed rule Chapter 127-A.

Thank you,

Patrick Gwinn
New Gloucester