

Townsend, Erle

From: smcgillan@mcgillaninc.com
Sent: Monday, February 5, 2024 11:40 AM
To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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To Whom It May Concern:

After reviewing the proposed program, I believe that this program should NOT be implemented or continued in any fashion. The State of Maine should follow the federal guidelines. My reasons are stated below:

1.) Consumer choice - Consumers should be allowed to choose whichever vehicle they feel fits their needs. Electric vehicle (EV) or other "clean vehicle" (CV) options do not fit those needs of most consumers.

2.) Geography/climate - Maine is a very rural state, with winters/cold season that are a majority of the year. EV's are not suited for cold weather as the batteries are not able to go the distance as advertised, due to use of heat and loss of charge due to cold weather. Also, many Mainers commute for work or other activities daily, with these being lengthy distances. EV's will not make most of these daily trips on one charge, based on experience.

3.) Infrastructure - Our electric grid is not ready for that many EV's, nor will it be in 10 years. Consumers must also bear the expense of installing charging stations in their home. For renters (single home or apartment complex) charging stations may not be provided.

4.) "Luxury Item" - I know one individual with an EV at this time. He is an Orthodontist preparing for retirement. He bought a Tesla for its performance and ability to zip around town or go on a short ride to the golf course. He also says the car would not be economical for the average person, many reasons listed above. His daily driver is still newer Ford F-150

5.) Cost/demographics - Maine is one of the oldest states in the country, population wise. People with limited incomes can not afford to install the charging stations in their homes. Also, while there is claims in the provided documents of a \$7,900.00 savings over 10 years, a battery failure will cost in excess of \$20,000.00. We don't even know if batteries will last 10 years. In our climate and corrosive environment (road salt, deicing treatments), I don't see how any savings will be realized.

6.) Emergency vehicles - It is noted in the documents that emergency vehicles are exempt from this program. If the EV technology is not good enough for emergency vehicle use, it should not be forced upon the consumer. Think about a consumer stranded in an EV for hours during a snowstorm.

I do understand the need to protect our environment, but this program will cause more harm than protection. Please consider this opinion.

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