

## Townsend, Erle

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**From:** Tim Plouff <TPLOUFF@rivah.net>  
**Sent:** Friday, January 26, 2024 1:33 PM  
**To:** DEP Rule Comments  
**Subject:** FW: Chapter 127-A, Chapter 128 Rulemaking Actions

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**From:** Tim Plouff [mailto:TPLOUFF@rivah.net]  
**Sent:** Saturday, January 13, 2024 1:35 PM  
**To:** 'Hinkel, Bill' <Bill.Hinkel@maine.gov>; 'BEP, Clerk' <Clerk.BEP@maine.gov>; 'ruth.a.burke@maine.gov' <ruth.a.burke@maine.gov>; 'slessard@bucksportmaine.gov' <slessard@bucksportmaine.gov>  
**Subject:** Chapter 127-A, Chapter 128 Rulemaking Actions

**January 13, 2024**

To Mr. Hinkel and the BEP Board,

In previous correspondence to you regarding the proposed Electric Vehicle Sales Mandates for the State of Maine pursuant to Chapter 127-A and Chapter 128, there were mentioned several instances of changing BEV dynamics within the industry. I feel it necessary to outline many of these developments, as the ground around BEV adoption evolves constantly. To disregard the significant business sides of this equation—and the corresponding effects that would be felt by Maine drivers/consumers—is to ignore reality.

- Since 2000, almost \$7-TRILLION dollars has been spent on lowering fossil fuel consumption via alternative, green energy. The world still uses fossil fuels for 80% of its energy, a reduction of only 1% in 23-years. (IEA)
- 49-million miles of new transmission lines are forecast by the IEA—International Energy Agency—to meet reduced emissions goals. Maine has yet to complete any new transmission lines.
- Chevron, Exxon/Mobil, and Shell have all announced expansive new oil exploration projects to meet increased demand for oil and gas. October, 2023
- GM scales back EV plant plans, delaying several new EV products and battery expansion. Oct/23
- Honda abandons \$5-billion joint-agreement to build small, economical EV's with GM, Oct/23
- Connecticut opts out of the California Emissions Standards. Rhode Island and New Hampshire also do not participate. Oct/23

- Ford announces that it lost \$62,106 on EACH EV sold so far in 2023, and projects to Wall Street that it will lose over \$4-BILLION on EV sales in 2023. Nov/23
- Tesla slashes prices, as sales slow. China's BYD EV brand, (ironically stands for Build Your Dream) announces that it has surpassed Tesla sales internationally. Analysts speculate that BYD will soon start 'dumping' excess subsidized EV vehicles into the marketplace Nov/23
- EV sales lose momentum, as dealership inventories multiply, Dec/23
- Investors Sour on EV Charging Companies, Dec/23, as share prices crash. "The investor class has grown weary of the industry's lack of profitability" said BLINK Charging CEO. "Our return on investment is not materializing".
- Mazda CEO Masahiro Moro delays future EV investments for the brand, as ICE vehicle sales rapidly grow. "Consumers are looking for alternative solutions other than battery EV's", Dec/23
- China restricts exports of graphite, a key component of EV battery production, Dec/23  
Layoffs follow at many US battery suppliers, as EV inventories also increase.
- Stellantis announces new RAM hybrid pickup truck, and delays roll-out of BEV Ram, Dec/23
- AAA's chief automotive engineer states, "Consumer demand will dictate the future and my prediction is that we will have a mix of EV's, hybrids, and ICE vehicles in dealerships and on US roads for many decades ahead. Hybrids are the bridge to the future". Their survey indicated that 78% of EV owners still drive an ICE vehicle for "lifestyle and travel".Dec/23
- Almost 4,000 US auto dealers petition the White House to 'back-off' on the EV sales mandate, as sales crater. Inventory levels of EV's continue to grow to double the days on lot compared to conventional vehicles, Dec/23
- Toyota announces it is doubling its budget for new ICE engine development and will continue to expand its hybrid-powertrain development, citing financial strength in hybrid production. Jan/24
- Nissan delays US production of EV's—for the second time, citing cost and slowing consumer demand. Jan/24
- Winners of the North American Car and Truck of the Year—by 50 independent voters—does not include a single EV. Toyota's redesigned Prius Hybrid is Car of the Year, while the Ford Super Duty is tapped as the Truck of the Year—due in large part to its more powerful diesel engine. The Kia EV9 EV Crossover gets recognition, but does not win. Jan/24
- Ohio Governor signs into law the Vehicle Freedom Bill, guaranteeing Ohio citizens the right to choose their own vehicle. Jan/24

The request by the NRCM to adopt California emissions standards for Maine also hides from citizens that by 2035, 100% of sales of new light-vehicles must be zero emission EV's. That is only eleven years away and totally dismisses the scope of the rule and its impact.

In much of the received testimony by proponents of the EV rule, there are hundreds, if not thousands, of adverbs projecting actions not currently founded in fact, that the proposed rule—will, should, could, can, projecting, etc. will improve emissions and not harm citizens economically. These comments, these hopes, these crystal-ball dreams should not be the basis for such a significant change to Maine and BEP regulations on new car sales. Despite many claims, our electric grid is not 'clean/green', and even after factoring proposed alternative power proposals for construction in Maine, much of this electricity is actually contractually committed to other states and not used in Maine.

The Maine BEP (and DEP) should allow the free market to continue to innovate on all forms of tech and transportation to reduce emissions—and not rely on compromised EV technology. This was the message from the many industry leaders at the recent SEMA Convention—the world's largest gathering of auto industry professionals. Emotions should not play a role in industry, environmental, and economic decisions of the magnitude of the EV mandate before your panel.

Thank you for your time.

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