

Townsend, Erle

From: trian@twc.com
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To: DEP Rule Comments
Subject: Comment on Chapter 127-A: Advanced Clean Cars II Program (Reposting)

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To members of the Bureau of Environmental Protection and Ms. Lynne Cayting:

My name is Peter Triandafillou and I am a retired forester living in Orono, Maine. I am submitting this letter in opposition to adoption of the proposed Advanced Clean Cars II (ACC II) rules as presented on the DEP website, and as amended due to the cancellation of the December BEP meeting.

Regardless of what one thinks about the proposed EV rules, it is indisputable that this is a huge policy decision for Maine. The rules will radically change our transportation infrastructure and come at a huge cost. This kind of major policy adoption must not be decided upon by a small group of political appointees at the behest of approximately 150 signatures. To address the concerns and input of all of Maine, major policies such as the ACC II must be debated and enacted in the daylight of the legislative process. I therefore support your decision to have the legislature address this issue, and I firmly oppose the adoption of these rules by the BEP. Just because something CAN be done, does not mean that it SHOULD be done.

The amended rules will require approximately 40% of cars sold in Maine to be EVs by 2028. According to the Bangor Daily News, EV sales were 6% of total in 2022. The odds of making it to 40% in a few years and 100% in approximately a decade are infinitesimal. Why set us up for failure?

Maine has a dispersed and relatively weak electric infrastructure. and we do not have the economic power of California. Forcing EV sales will be expensive, but nothing like the cost of installing three-phase charging stations all over the state. If we are going to depend on pure EVs (not hybrids), we need to duplicate the fuel distribution network (gas stations) for electricity. I discussed this with a colleague who manages an electric cooperative in the western US. He told me that the cost of installing fast charging stations where three-phase power does not exist, which is most of Maine, can be hundreds of thousands of dollars per station. We have not begun to calculate the cost of rapidly making this infrastructure conversion.

The proposed rules mandate a certain kind of vehicle. However, it can be argued that Maine would be much better off adopting rules for hybrid and plug-in hybrid vehicles in the near to medium term. These vehicles are very efficient yet have the capability to charge their own batteries. This would be a much better option for the vehicle owner than the 72 hours it takes to charge depleted EV batteries on a standard 110V household outlet. Plug-in hybrids would allow for a much more reasonable time frame to install charging stations across the state.

Like much of the country, Maine's power grid is fragile, and sometimes fully utilized. Electrifying the automobile fleet is like adding hundreds of thousands of homes to the grid. Nowhere in these proposals do I see concrete plans for the billions of dollars of investment needed to upgrade and expand our grid and the available power on the grid. Without such an investment, mandating EV sales is a fantasy.

I noticed that emergency and utility vehicles would be exempt from the rules. This is good news, but if EVs aren't acceptable for those vehicles, why are we forcing them upon the rest of the citizenry?

I urge you to reject adoption of the ACC II rules and leave this up to the Maine Legislature. We are much better served by exploring our own market-based solutions that accomplish similar goals at lower cost and without upending our economy and power grid.

Thank you for your time.

Peter Triandafillou