

Breton, Mary B

From: Alexandra Fors <alexandra.fors@oconnorwheels.com>
Sent: Friday, August 25, 2023 3:52 PM
To: DEP Rule Comments
Subject: Regarding Electric Vehicles Sales Mandates on Small Vehicles (Proposed Rule 127-A)

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I am writing to you today to urge you to support the autonomy of Maine citizens in the purchase of our vehicles by opposing the proposed rule to mandate the sale of light-duty electric vehicles in Maine. This plan requires that beginning with the 2027 model year, 43% of vehicles sold must be electric vehicles. This plan is costly, unrealistic, and requires dealers to abandon our longstanding principle of finding vehicles that best suit the needs of our customers. It will not only put pressure on the manufacturers to allocate vehicles in a way that doesn't follow logic or the trends of the state it's being inflicted on, but will also threaten the stability of thousands of incomes of hard working Maine residents.

Dealerships are manned not only by sales people – who are trained to work with our customers to find the appropriate vehicle for them based on their needs and desires, not the calculations of out of state interests – but also by mechanics, accountants, receptionists, administrators and many more roles that serve the intricate needs of a business. To force dealerships to pivot from serving the needs and desires of our customers to structuring ourselves around pushing vehicles that are *only* guaranteed to line the pockets of people who don't even live in our state is short sighted and poorly conceived, and telegraphs a severe lack of understanding of the mindset of Mainers and the lives we choose to lead. If Main residents want and need electric vehicles, Maine dealerships are more than capable of evolving to meet those demands, but must be permitted to do so with the benefit of their own insight into how those adaptations should be rendered.

Lynn, this plan is being foisted upon residents who have no say in the matter. It will not be received gracefully or gratefully. It will likely impact many of our lives and create hardships that will ripple outwards into our community and economy.

Rule 127-A's plan is burdensome and costly to dealers. The California rules define "sale" in such a way as to mean the transaction between the manufacturer and the dealership, not the purchase by an ultimate user. Any penalties assessed would fall on the manufacturers. In an effort to avoid penalties, manufacturers will act to ensure a sufficient mix of EVs and ICEs are on dealership lots. This means dealerships will have vehicles in stock to meet manufacturer obligations, not necessarily the vehicles customers want or need. Dealerships will be left with unsold inventory for which they are paying interest to a financing source, which is not only burdensome but incredibly costly.

Dealerships have and will continue to invest significant resources to handle electric vehicles. However, challenges still exist, such as nation-wide shortages of utility transformers and switching boxes which prevent dealerships from bringing 3-phase power to the location; upgrading and replacing dealership internal electrical setup; ongoing higher utility costs to maintain new systems; and costs associated with purchasing and installing electric vehicle chargers. **In addition, Maine's electric grid and charging station infrastructure is not, and will not be, sufficient to handle the increased demand.**

This rule not only burdens dealers, but it severely restricts and potentially eliminates consumer choice. Customers will no longer be able to select vehicles based on their wants and needs. Maine customers will simply purchase vehicles in other states like New Hampshire, who do not have these mandates. Maine does not have registration denial, so Mainers can buy vehicles out-of-state and then register them to drive in Maine even though dealers cannot sell the vehicles they

bought. Maine customers may also just decide to keep their current vehicle or trade for another used vehicle which negates the climate goals this proposed rule seeks to achieve.

Dealerships work to help customers purchase the vehicle that best suits their needs, and we oppose efforts that reduce that choice and burden hardworking Mainers.

Again, please oppose the proposed Rule 127-A electric vehicle sales mandates on light-duty vehicles.

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