

Breton, Mary B

From: Michael Bickford <mlbickford@live.com>
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To: DEP Rule Comments
Subject: Proposed California Style Vehicle Emissions Regulations

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My name is Michael Bickford and I live in Falmouth Maine. I have a Plug-in Electric Rav4 Prime which we love and a hybrid truck. However, I would have to say this proposed legislation makes little sense for a state with the population density of Maine. I believe we need to encourage EV's, but mandating them ignores many realities for our other voters.

- 1) Many in Portland, Bangor, and other populated parts of the state have on-street parking without the benefit of garages or direct parking at their apartments. My daughter wanted to buy a full electric vehicle but cannot charge it at her home or sting power cables across the walkway and she owns her condo. It is worse for renters, who have to find parking on the street, many times a few blocks from their homes.
- 2) The vast majority of towns and rural districts in Maine have little or no public charging stations. Again, my daughter was looking at where she could charge in her hometown of Westbrook. There were no charging options in her area of Westbrook. Separate, we go up country to my father's place of birth. Northern Maine has hardly any infrastructure. Often, we would have had to go to Canada if we had needed to charge. We can say that charging infrastructure would come with this mandate, but Maine has many small territories that don't even have town names. Places with hardly any population density would not be practical for commercial charging investment.
- 3) Find My Electric has the average cost of an EV at around \$64,000. This is about \$16K more than the average new car. Given the demographics and income characteristics of the state, many could not afford this premium. With the extra expense for batteries, required rare earth materials, and batteries that weigh about 1,000 lbs., EVs are not likely to get cheaper than ICE cars.
- 4) The pick-up truck is one of the most popular vehicles in Maine, making sense for many who tow, haul and work with their trucks. None of the EV trucks offered to date have any significant towing range. For example, towing a heavy load from Cumberland County to Aroostook County would need at least two full charges using a Ford Lightning. A full charge takes a long time and again, there are very few places to charge up country. Furthermore, no charging facilities are set up for vehicles with large trailers hooked to them. Someone towing would have to find a place to dump their trailer, charge, then rehook up the trailer. However, there are few places along 95 and even less off 95 that have charges as you get North.
- 5) Cold weather in Maine significantly impacts the range of our Rav4 Prime and is said to impact the range of all EVs, especially if the vehicles are not garaged and pre-heated. Given that there are more than 300 miles of Maine, end-to-end, range becomes a huge issue. Our use case for the Rav4 around Falmouth and Portland is perfect. We can get 52 miles of range which mean around town, we hardly ever use gas. However, if we go up North, or have to commute to Boston or further, it gets much harder to use a pure EV. It would be ingenuous to say, EV's work for me, so they should work for you when you might have different use cases.
- 6) We went to Florida in our Plug-In Electric. We had hoped to charge every day. None of the Marriotts on the way down had chargers. We tried local charges and many of them did not work at all. And once in Florida, the chargers near our hotels were often completely full and slow when we could get to them. We even had a Tesla parked in a charging space, not charging, because it was closer to the mall entrance.
- 7) In Maine, we get our fair share of power outages. CMP does a good job, but sometimes it takes more than a day to get power restored. Can't charge my car, then I can't go to work.
- 8) We are told that we will save lots of money going to EV. We currently do all of our around town on electric with our Rav4 prime. However, we are not saving much given the high kWh costs from CMP and their providers. We also tried to go to Solar only to find out that we were banking and paying for up to three times our energy usage. The 15% off, was actually killing our budget and doubling our energy costs.

I get the thought process. The infrastructure is not ready now, but it will be when these requirements kick in. Still, we are never going to change the economics of up north (with its low population density) which has trouble even getting cable. We also are not going to fix apartment dwellers and others that can't connect to power at home. Furthermore, if we make CMP increase their grid capacity, we know they will pass those costs back to the taxpayers, as they recently proposed with their last rate hike suggestion.

Thank you – mikeb
207 747-8461