

August 17, 2023

Comments to the Board of Environmental Protection on Chapter 127-A:

Advanced Clean Cars II Program

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Chapter 128:

Advanced Clean Trucks Program

Good morning, members of the board:

My name is Nathan Gould, and I live in Winterport. Thank you for the opportunity to comment on Chapters 127-A and 128.

It is deeply concerning to me that the sweeping changes these rules will bring about come at the request of only about 150 signers of a petition. Prohibiting gas-powered vehicles is not a routine technical rule change. These are drastic changes that will greatly impact our neighbors, yet are not voted on by our legislature, not even drafted in our State. The People of Maine must be subject to laws enacted by our legislature and the process of representative government, not the orders of California regulations. Even if we have arrived at these multistate compacts through our representative government, we have been brought to an untenable position.

It cannot be stated enough times today: Maine is not California. Take into account our colder climate and harsher winters, our higher-than-average electricity rates and older, low-income population, our greater energy needs.

Electric vehicles still do not perform well in harsher climates. I respect your intelligence enough to not feel the need to explain how the climate of Maine is

strikingly different than that of California. Batteries drained in cold weather combined with longer distances between our fewer charging stations is already a recipe for disaster, then consider that this would be amid the artificial increase in demand this rule change would bring.

It is touted that with electric vehicles, you are not spending money on gasoline. It needs to be reiterated that more electric vehicles on the road puts a greater strain on our electric grid, which leads to increased electricity rates. The upfront cost of EVs is prohibitive for myself and many others.

We already have to contend with threats to seize the assets of private companies that both deliver our power and have the expertise and manpower bring the electricity back on when winter brings its worst. We are already faced with being forced into solar and wind with their lower capacity factor when compared to fossil fuels. I would say what works for California does not necessarily work for Maine, but then I hear of California's rolling blackouts. Such a crisis in our State is unnecessary and avoidable if we are wise enough to reject plans unsuitable for our State. We don't want our government picking winners and losers. Let the free market work.

It is hard to imagine why our little State, with its tiny contribution to the world's net CO2 emissions, would be forced into following such ill-advised, stringent, and harmful prohibitions. In war, it is the aim of one nation to cut off its adversary's supply of energy. It is my hope that Hanlon's razor is what applies in this case, that these rule changes are brought about by err, naive optimism, or ignorance and not intentional sabotage. It is my hope that this Department would take steps to restore our neighbors' severely strained confidence in this government's integrity by rejecting misguided rule changes brought on by special interests and instead work for the better of the People of Maine. I think the special interests have been the favorite for long enough, and it is time for our neighbors, the People of Maine, to have a turn being the favorite nephew.

Thank you for your time.

Respectfully,

Nathan C Gould, Winterport