

Dear Commissioner Loyzim,

As a propane provider in Maine, I urge you to reject efforts that would grossly distort the passenger vehicle and commercial truck marketplace by implementing zero-emission (e.g., electric, hydrogen) vehicle delivery mandates. The Advanced Clean Cars (ACC) and Advanced Clean Trucks (ACT) rules seek to increase, on an annual basis, the percentage of zero-emission vehicles (ZEVs) automakers must deliver into the Maine market. Flooding the marketplace with more ZEVs will, of course, have an impact on other clean, alternative vehicle fuels, including propane autogas.

While I support efforts to reduce emissions of air pollutants and greenhouse gases from the transportation sector, the Board of Environmental Protection (BEP) should take a broader and more practical approach to improve air quality and reduce the carbon intensity of transportation fuels.

Propane autogas, for example, burns cleanly, efficiently and has a low-carbon content. Given propane's clean profile, we can greatly reduce emissions of black carbon, particulate matter and nitrogen oxides from our roadways by displacing legacy fuels, especially across medium- and heavy-duty applications. Remember, even if an electric vehicle lacks a tailpipe, it is not truly zero-emission because our bulk electric grid is not zero-emission. In fact, it is far from it.

Despite government delivery mandates, consumers and businesses will only purchase vehicles that meet their unique transportation needs. Propane-powered vehicles have the power and operating range required to meet the real world demands of commercial transportation, including providing necessary payload to move people and products. These attributes are, in part, the reason school districts across the Pine Tree State have chosen propane as their preferred clean school bus fuel of choice. Maine's low population density, harsh climate and higher than average electric rates mean EVs aren't the right answer for everybody. There's certainly no reason BEP needs to force them upon Mainers. Consumers and fleet managers are well-positioned to decide for themselves what transportation fuels meet their unique needs.

Widespread transportation electrification efforts will have significant impacts on the demand, shape and variability of the electric load. ISO-New England already has issues dealing with peak demand scenarios and severe weather events. The ACC and ACT have the potential to exacerbate these issues.

DEP should fully consider the true impacts on the electric grid, the environment and the marketplace for competing clean transportation fuels, including propane autogas, before blindly bringing California standards to Maine. Please reject the ACC and ACT and, instead, work towards a more realistic and pragmatic way to reduce emissions from the transportation sector.

Thanks for your consideration.