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August 21, 2023

Lynne Cayting, Chief
Mobile Sources Section in the Bureau of Air Quality
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

Rulemaking Comments for Chater 127-A, Advanced Clean Car2 Program

Dear Ms. Cayting,

I write to you to share my facts and feelings as a Maine resident and Maine business owner about the Advanced Clean Car2 Program. As I am originally a farm boy from Vermont and came here to go to school, I truly have a love for the outdoors and responsibility to protecting it. My hobbies and favorite getaways still involve being outdoors. So, I am certainly a supporter of protecting our environment and making reasonable changes to advance the protection of our outdoors. However, I do see multiple problems with the Advance Clean Car2 Program, and I don't believe it accomplishes what it is intended to do. As a business owner that sells vehicles that fit into everyone one of these classes I have read, listened to, and witnessed the results and performances of this product firsthand.

I personally attended the public hearing on August 17th at the Augusta Civic Center and listened to what was said as to why Maine needs this rule; we must force the Manufacturer to build these vehicles. "There are a lot of customers that want to buy them, and they can't get them," this is not true. There are already on the ground in Maine a lot of EV vehicles sitting in dealer's yards with many more on the way in the next 18 months. I am in my showrooms every day reviewing my customer leads, we are not getting people asking for them, people aren't wanting to order them. I do have a lot of people saying they will never buy an EV and will change to a brand that sells gas vehicles. After listening to all the comments, I believe this is about lowering our emissions as a state. I ask why this isn't a state emission standard being set instead of a mandate?

Manufactures are and have been spending trillions of dollars on getting vehicles designed and built that will meet zero emissions in response to a Federal Emission Standard that is already in place for 2027. The new emission standard in 2027 is .02 for medium and heavy-duty trucks and the new light duty standard hasn't been disclosed to my knowledge but is supposed be very low. This is a huge reduction to current standards. They know to meet this level; they will have to get multiple vehicles available at zero emissions. They will certainly get there, but it will not be with just one engine choice. There is going to be multiple zero emissions available before this is done. There was a lot of conversation about being able to

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buy credits to offset where they fall short, that is not as easy as it was presented. First, that is very expensive and will be passed on to the public in cost. Secondly, there is not the number available that is needed. I ask if we had everything at .02 emissions today, would this rule even be on the table. I would suggest we offer credits to take the old emissions off the road. This would lower our emissions very quickly.

The grid and charging stations are the big piece of this rule that is very concerning and not at a level able to support this bill. I have been working on this at my own dealerships for two years now and have spent \$200,000 dollars on infrastructure and chargers. I still don't have one charger that I need, my 50KW charger is still not operable and I'm told this is already outdated and I will need to buy a 100KW enable to charge at a rate needed. I have been told if my fellow dealers in Bangor run their chargers at the same time it will take out the Hogan Road. The cost was explained as cheaper than gas to charge an EV, maybe if you charged at your home. Public charges are now more expensive than gas or diesel to plug into. I ask how many Mainers don't own a home and will be forced to use public charging at a much higher cost. Last week two battery companies filed for bankruptcy.

I listened to testimony that climate doesn't matter, this is simply not true. I have asked every engineer I have spoken with about climate and terrain and its effects on batteries. They have all said it loses at LEAST 40 to 50 percent of its charge in freezing temperatures. They did not say that means 30 below, freezing is 32 degrees or below. So that lowers ranges under 100 miles. Last winter during one of the storms, we had a customer on Interstate 95 call and asked to use our charger. He had left Gardiner with 40 percent charge and was now getting messages he was out of range. He had shut off his heat, and anything that would draw on the battery trying to get it to us. However, I couldn't help him because my charger wasn't operational.

This situation will absolutely be turned into a dealer's problem. The manufacturers will force us to take them, and we will have them in our yards with no one to sell them to. This bill keeps being explained as the manufacturers' problem, that is simply not true. It is going to be the dealers' problem. This situation will without doubt force some dealers out of business, there will be no choice. The reason it stops as the dealer's problem is this, there is nothing stopping consumers from leaving the state and buying any type of vehicle they want and can bring it back to Maine and register anything. If this is truly about lowering emissions in Maine, why is this? This is why this needs to be a regulation through registration bill. It simply doesn't work if they are just sitting in dealer's yards.

In conclusion, they are 2-3 times more expensive than gas models, they are very heavy and will break Maine roads down much faster, they aren't cheaper to run or own. Let the people that can afford them, and want them, buy them. There are a lot of options available now and many more on the way. Forcing the rule will only do the opposite of its intention and people will drive their older vehicles longer. This is not good for Maine people.

I truly hope after you consider the facts and the effects of this rule you will understand this Rule is not the answer for Maine.

If you consider signing this rule these are some points, I feel need to be added.

- 1.) Power companies and chargers must have sufficient power and chargers in place for the total state at a level equal to the sales percentage dealers must meet and provide evidence of doing so 12 months prior to dealers being required to sell the mandated levels of this product. How can you ask dealers to be forced to sell a product that can't be charged after purchased?
- 2.) The percentage of 43 percent is too high, to go from 0 to 43 percent in one year is impossible. It should start at 10 percent and go up 5 percent each year after.
- 3.) I believe the timeline is short.
- 4.) Must be regulation through registration. You can't allow everyone to go buy anything they want and bring it back and register here if this is truly about helping Maines environment.
- 5.) I believe this should be a state emission level standard not a rule for some.

In closing, I am for protecting our environment and having a lower emission standard. I don't support this bill because it forces one engine choice and there is going to be multiple options coming. So, we invest billions of MAINE dollars in chargers and infrastructure and then to realize they have a hydrogen fuel cell that performs better and costs less. Then what happens to our infrastructure? Is this about helping our environment, if so, why is forcing an option? Someone asked how this is any different than when we changed from horses to cars and trucks? Here is the difference, no one ever mandated you had to buy a car, horses were around for a long time. And think about how many vehicle manufactories never made it, maybe this happens to EV because there is a better option to get to zero emissions. It happened in its own time frame and with the best options. I don't believe this helps Maine people, its economy, or its environment. I feel we will have the emission levels needed by meeting the requirements that are already coming.

Thank you for your time and consideration.

Randy Hutchins