Breton, Mary B

From: Steve I <sjiemail@yahoo.com>
Sent: Thursday, August 17, 2023 5:59 PM
To: DEP Rule Comments
Cc: news
Subject: Chapter 127-A: Advanced Clean Cars II Program

The following are my comments on the proposed "routine technical rule" regarding the Clean Cars II program Department Rulemaking Proposals, Maine DEP :

1. This does not seem to be in the spirit of what one would reasonably consider to be a "routine technical rule". This seems to fall within what a reasonable person would consider a "major substantive rule". As such I suggest that the Board reject this request, as presented, as being beyond the scope of a "routine technical rule" and follow the "major substantive rule" process. The proponents are obviously trying to avoid the legislative review process with how they've approached this. Major Substantive Rules | Maine State Legislature
2. Considering that the State is still progressing through its goal toward 80% of our electricity being generated by a renewable source by 2030, I would suggest that a start date for this Clean Cars proposal align with the 2030 date, and not 2027. This also allows time for the EV market to mature further and "works the kinks out" from what is still a fairly novel mass market product in the U.S. I further propose that the State start with a goal of 28%, which is roughly consistent with the State's goal of 219,000 EV's by 2030 (there are about 784K passenger vehicles registered in Maine as of 2022), rather than the proposed 43%. I would further suggest that the goal be increased by 3.5% per year until 2050, with 2050 being the year the State is targeting to reach its goal of 100% renewable energy. Renewable Portfolio Standards | Governor's Energy Office (maine.gov), RF-RP-39_84100366_20230101_03_16_57_454.pdf (maine.gov)
3. Consider staggering where zero emissions vehicle registrations must first occur in the State so as to align with both the higher population density and also the higher level of public charging stations EV Initiatives Background - Efficiency Maine. This would be akin to the concept where Cumberland County registered vehicles must have an emissions inspection, whereas the remainder of the State is not required to have an emissions inspection. Motor Vehicle Inspections | Maine State Police
4. Evaluate the capacity of the State to handle the proposed influx of EV's under any proposed rule. Considerations should include a) that Maine is currently #19 in the country for the least number of public charging stations per registered EV as compared to California which has the second highest number of charging stations per registered EV, so adopting CA emission standards without a corresponding significant improvement in the number of public charging stations throughout all corners of Maine would be irresponsible Charging Stations By State | EVAdoption, b) conduct an evaluation as to the ability of the State's electric grid to manage the proposed influx of EV's under any proposed rule and conduct this study on a county by county basis (i.e. the grid in southern Maine may be better suited than in central and northern Maine for a large increase of electric usage demand. This study should also take into account the recent announcement by the State to substantially increase the number of heat pumps, which also places an increase demand on the electric grid After Maine Surpasses 100,000 Heat Pump Goal Two Years Ahead of Schedule, Governor Mills Sets New, Ambitious Target | Office of Governor Janet T. Mills, c) conduct a study of what potential adverse impacts the proposed rule may have, whether it be (i) no or limited access to public charging stations in more rural areas, (ii) the higher purchase cost of EV's as compared to median income in different portions of the State, (iii) older housing stock in different portions of the State whose home electrical service may have greater capacity challenges and higher costs with installing an upgrade to support a home charging station, (iv) lower EV battery performance in the colder climates especially of central and northern Maine (i.e. battery performance and driving range deteriorate as temperatures get colder) How Well Do Electric Cars Work in Cold Weather? | Cars.com, Global race to boost electric vehicle range in cold weather | AP News and (iv) any other constraints that currently results in certain areas of the State having lower EV adoption rates Maine has reached just 4 percent of its goal for electric vehicles (bangordailynews.com).
5. Conduct a study, in cooperation with the Maine Fire Chiefs Association, about the challenges that EV's present to first responders, the public and to EV owners from fires related to EV's, and how to mitigate the risks How EVs Have Changed Roadside Firefighting | Capital One Auto Navigator.
6. Periodically review the proposed goal in light of future changes (positive or negative) which may occur, whether it be from changes in EV and other zero emission technology, manufacturer production capacity, changes in the

State electric grid, Federal and State consumer purchase incentives which may increase or decrease the consumers cost to purchase an EV or other unmentioned changes.

Thank you,

Steve Ingalls
Stetson, ME