

**Subject:** Regulations Seeking to Ban the Sale of New Fuel-Powered Vehicles

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**From:** Keith Belhumeur

**To:** HearingComments, DNREC (MailBox Resources)

I would like to record some comments related to proposed regulations seeking to ban the sale of fuel powered vehicles. Although it will be necessary to move in the direction to move away from current vehicles, the proposed regulations pose several concerns.

1. The predicate that the Governor has made the determination to implement these changes is a red herring in that Delaware's air quality is meeting the federal standards and the Governor is failing the people of Delaware by not holding the surrounding states accountable for their pollution nor fighting for the people of Delaware in allowing our environmental efforts to be negatively characterized when the sources are the responsibility of others. The Governor has created a false sense of urgency that seems more of a political one rather than a data driven necessity. Slow the roll until you have a comprehensive plan that includes adequate logistics, infrastructure and supply chain considerations.
2. The speed of the changes are not commensurate with the availability or planning for vehicle charging infrastructure within the state and also elsewhere in the country.
3. The regulations do not take into account that the electrical power grid infrastructure within the state is not equipped to keep up with the rapidity of the demand that the changes will create. The logistics required for such changes needs to be included in any regulations or plans so as to make the transition to electric vehicles viable in reality.
4. The state regulations and local electric suppliers limit individual solar power systems to 110% of power usage when the system was installed. Requiring individuals to go electric will require more robust solar power generation to be allowed and installed. The current plan does not address how solar power generation increases required for solar power users will be enhanced to cover the increased requirements. What changes to current individual solar power systems will be enacted to support such increases and require local utilities to accommodate the new electric power increase requirements. How is the state going to protect solar power generators and what tax incentives are going to accompany these changes.
5. Gas is regulated and taxed and supply is readily available almost everywhere. What will the state do to regulate the availability of charging stations, the metering and sales of electricity to charge vehicles away from homebase and the availability of charging venues.
6. It's not all about Delaware. EVs do not allow a person to drive to other destinations beyond about 350 miles without stopping for several hours. Some of us have to drive to other states to take care of elderly parents and with EVs it takes much longer to get there due to charging requirements.
7. There are personal security concerns when one must stop somewhere for several hours to charge a vehicle and be waiting around and vulnerable. Crime and risk increase extremely more when potential victims are sitting around in areas waiting for a vehicle to charge.
8. The regulations for California should not be required for Delaware. Delaware's infrastructure, Mean personal income, state revenues should drive the regulations for Delaware, not a boilerplate that worked for California. Devise a tailored Delaware regulation instead. Extend the plan to a longer time so vehicle supply and availability challenges can be met. The current speed of implementation will create a situation whereby individuals do not properly license vehicles within the state timely.

Thanks for this opportunity to voice some of my concerns. I do see that we should move away from fossil fuels but we need to do it smartly and make sure it is done in unison with infrastructure, supply chain, security and affordability equity for those on a fixed income. Delaware has a large number of retirees who may find it difficult to afford expensive EVs.

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Keith Belhumeur