

Subject: Public Hearing Comments

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From: DoNotReply@delaware.gov

To: HearingComments, DNREC (MailBox Resources), r-2v@msn.com

Comments on 2022-R-A-0011: Low Emission Vehicle Program

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Organization:

Comments:

While I support the spirit and ultimate objectives of this proposed regulation, I oppose the timetable established for its implementation. DNREC is not yet in a position to guarantee that a reliable electrical power supply will exist within Delaware to support a wholesale conversion to electric-only vehicles by 2035. Fossil fuel powered electric power plants are being taken off line (Indian River to close by 2026) and their envisioned replacement by renewable energy power plants (e.g. offshore wind and solar) do not now and are not expected to generate sufficient replacement capacity to meet increased electrical grid demand created by this regulation. Until the state can confirm that an uninterrupted supply of electric power will be available to meet the expected 20-50% increase in demand (USAFacts) for electricity created by a conversion to 100 percent electric vehicles, the state cannot responsibly mandate this requirement. One need only look to California's unsatisfactory record of renewable energy power generation (https://catalyst.independent.org/2020/09/01/california-blackouts-grid-reliability/?gclid=EAlalQobChMI8uLB4qWY_gIVzytMCh0JpwSEEAAYAiAAEgLfQfD_BwE) to see that a bleak future of repeated power outages is ahead for Delaware residents if this regulation proceeds according to its proposed timetable without first ensuring power grid capacity guarantees. Additional factors that should be factored into a reassessment of DENREC's timetable for this regulation include: - the need to first have in place a ubiquitous charging station infrastructure as extensive as what currently exists for gasoline powered vehicles, - the need for a cost-effective commercially available successor to the lithium ion battery that provides improved range equal to the internal combustion engine, and which is produced without reliance upon imported rare earth minerals, and - the need to have in place a statewide recycling program for the disposal of expired EV batteries. Unless and until state government is able to provide these assurances to Delaware residents, DENREC is not ready to issue this mandate. Accordingly, I urge DENREC to revise this regulation's implementation schedule to align with the state's ability to provide assurances related to sufficient power grid capacity, charging station infrastructure, and new EV battery technology as outlined above.