

Fwd: EV mandate proposed regs

Peter Bradley <peterbradley727@gmail.com>

Mon 5/1/2023 3:55 PM

To: HearingComments, DNREC (MailBox Resources) <DNRECHearingComments@delaware.gov>

 2 attachments (487 KB)

EVdownside.pdf; evfalsepromise.pdf;

----- Forwarded message -----

From: **Peter Bradley** <peterbradley727@gmail.com>

Date: Mon, May 1, 2023 at 3:46 PM

Subject: EV mandate proposed regs

To: <DNRECHearingComments@delaware.gov>

The proposed regulations, while well intended, are flawed in a myriad of reasons and will have significant local, national and international unintended negative consequences. It is naïve to promulgate mandates without assessing the full ramifications and impact of such mandates. We have seen time and time again - the success of our country is the core philosophy of free market determination of technology solutions compared to government mandates. If Electric vehicles are such a benefit to the consumer, makers will be rewarded in the marketplace which negates the need for mandates. It is that simple.

The following are some key negative consequences of this mandate:

Local Delaware Level

The mandate will have a significant negative economic/costly impact on the typical Delawarean. The average electric vehicle is far more costly at this point than a gas-powered vehicle. A cost which is simply out of reach for most Delawareans. Any proposed tax credits to offset the cost will be borne by the state and ultimately the taxpayer.

Electrical grid - The state and utilities will have to make major investments and upgrades to our electrical grid to handle this additional capacity. Any reasonable person knows electric rates will increase for businesses and the consumer. As such, Delaware will become a less business friendly state. Ironically, additional electrical power for the grid will have to come from Gas and coal fired plants.

Infrastructure - The state is going to have to make huge, significant infrastructure improvements - i.e. charging stations to handle the dramatic increase of electric vehicles. This cost will be passed on to the taxpayer.

Gas Tax - the state currently has a 23 cents per gallon gas tax which goes to support the DelDOT highway fund. There will be a significant decrease in revenue which will have to be made up somewhere else. Any proposed mileage based user fee approach (besides being administratively challenging to implement) would adversely impact rural drivers in our state.

Car Maintenance infrastructure – Electric vehicles require their own unique maintenance facilities and infrastructure. The likely reality is we will not have sufficient car repair facilities to handle this increased volume resulting in higher prices to maintain and repair an electric vehicle. In addition, existing car repair facilities (many owned by small business owners) will be challenged with potentially decreased business as well as costs to upgrade their facilities to handle EV's.

Hybrid Cars - **The proposed regulations do not touch on the benefit of hybrid cars which are and could continue to be a valuable option for consumers and aid in green energy efforts.**

Commercial Trucks. Vans – The current EV technology does not benefit commercial trucks and vans as the battery charge and power capability are lacking for these types of vehicles. Imposing this requirement on this class of vehicle will impact businesses and result in higher costs which will be passed onto the consumer.

Stifle new technology - You can make the argument that EV's are not transformational technology for a better green environment. Mandates like this can stifle break through transformational technologies such as hydrogen-based cars. EV's wind, solar cannot materially address our full energy needs and come up high infrastructure costs as outlined in the attached article.

National and International Level

Electric vehicles are harmful for the environment. Attached is an excellent article which details the typical electric vehicle requires 6 times the mineral inputs compared to an internal combustible engine. The primary metals in EV batteries include Nickel, Lithium, Cobalt, Copper and rare earth metals. All these metals require strip mining which is destructive to the environment. 80% of the world's supply of cobalt is in the Congo where it is mined under horrendous, well documented conditions with child slave labor.

It is also noteworthy our adversaries – China and Russia are in the top 3 in reserves for all these metals. We will rely on China for these metals while they will continue to build coal fired power plants. Consumption of these materials have to increase in dramatic fashion which we will be beholden to our adversaries as well as be destructive to the environment via strip mining.

Electrical Grid - By all accounts, the nation's electrical grid is in need of major upgrades for continued reliability and protect against attacks such as Electromagnetic Pulse (EMG) attacks from an adversary, other cyber-attacks in addition to reliability concerns. Adding significant capacity to the grid will complicate and aggravate shortcomings of the grid.

Summary

While well intentioned, these unrealistic mandates will adversely impact Delawareans and our nation given the above. We should continue to let market forces, American ingenuity lead the way in addressing our energy goals.

Thank you

Pete Bradley