

Subject: Public Hearing Comments

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From: DoNotReply@delaware.gov

To: HearingComments, DNREC (MailBox Resources)

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

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Organization: No

Comments:

I have a few concerns regarding EV which I haven't seen addressed. 1. The law should not dictate EV as the solution, the objective of going green is to reduce/eliminate pollution associated with gasoline powered vehicles. Any new rules must be flexible enough to accommodate new technologies such as, green hydrogen, efuels, natural gas, propane, or ethanol. Germany and Porsche, along with Exxon, are developing an efuel for the combustion engine, <https://corporate.exxonmobil.com/what-we-do/lower-emission-transportation/emerging-vehicle-and-fuel-technology/exxonmobil-and-porsche-strategic-collaboration> . They are producing about 1 Million barrels a day now. Siemens is developing green hydrogen. The rule/law should state a pollution limit and take a holistic approach to calculating the pollution level, incorporating the production, use and disposal factors. 2. Are the Delaware Electric Coop and Delmarva Power grids ready for the increased demand for electricity, especially during the summer? The Washington Post, in 2021, stated the grid isn't ready, <https://www.washingtonpost.com/business/2021/10/13/electric-vehicles-grid-upgrade/> . The 26 Jan 2020 Spokesman-Review in Seattle, quotes Washington state officials stating that if everyone recharges at night, the grid will be challenged, <https://www.spokesman.com/stories/2020/jan/26/electric-cars-will-challenge-state-power-grids/> . I haven't seen anything stating Delaware's grid will be able to handle the demand other than a vague warning from PJM in the 18 Feb 2023 Cape Gazette, <https://www.capegazette.com/article/power-grid-officials-flexibility-needed-more-electric-vehicles-plug/253759> , "We see that increased electrification of vehicles leads to load profile increases for both the summer and winter peak demand periods, which can be managed if charging is flexible," he said. "Widespread electrification that includes building heating and industrial use is likely to increase the risk profile for the winter season." That doesn't say Delaware's grid is ready. 3. What is Delaware's approach to battery disposal? Ship them out of state? Problem solved? A solution needs to be identified and implemented before Delaware jumps in with both feet. Perhaps, we charge a disposal fee when the EV vehicle is bought and refund it to the buyer when they turn the battery in to a registered battery receiver. 4. Are local fire stations, volunteered and professional, ready to handle fires associated with EV vehicles? Do they have the specialized equipment to put out these fires or is the solution to just let the vehicles burn themselves out? National Transportation Safety Board - Safety Risks to Emergency Responders from Lithium-Ion Battery Fires in Electric Vehicles Fires in electric vehicles powered by high-voltage lithium-ion batteries pose the risk of electric shock to emergency responders from exposure to the high-voltage components of a damaged lithium-ion battery. A further risk is that damaged cells in the battery can experience uncontrolled increases in temperature and pressure (thermal runaway), which can lead to hazards such as battery reignition/fire. The risks of electric shock and battery reignition/fire arise from the "stranded" energy that remains in a damaged battery. 13 Nov 2020 <https://www.nts.gov/safety/safety-studies/Pages/HWY19SP002.aspx> 5.