

Subject: Public Hearing Comments

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

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Organization:

Comments:

I am strongly in favor of adopting the Advanced Clean Car 2 rules for Delaware. We are on the cusp of a major technological shift, much as we were a century ago when the automobile replaced horse-drawn transportation. This transformation was accompanied by environmental, infrastructure, safety and economic challenges, much as we see today. Back in those days, however, municipal leaders across the country faced an overriding concern. The many horses providing transportation in their streets produced an unmanageable amount of manure. The unsanitary conditions with their attendant health risks, flies, and odors were threatening the livability of growing cities and towns. So those leaders embraced a new technology that promised a cleaner, healthier environment for their residents. They took on the challenge of providing appropriate infrastructure for the new machines, which sparked innovation and economic opportunities. They faced criticism from those who wanted to hold on to their traditional ways, but eventually, the superiority of the new technology was clear to everyone, and internal combustion engines replaced horsepower, even in rural areas. Of course, as we now know, gasoline-powered vehicles come with their own harmful waste products. Unhealthy emissions now flood our skies from millions of tailpipes. Fortunately, a cleaner technology is now a viable option, and we are in a position to facilitate a more rapid and widespread adoption. Many of the arguments made in opposition to automobiles in the early 1900s are echoing today in the voices of ACC II's opponents. Did the leaders of the early 1900s wait until all the needed gas stations and other infrastructure were fully built out before they allowed cars onto their streets? No, they took steps — including creating new rules and investing public funds — to encourage and speed up those new enterprises. Did those leaders ban people from owning horse-drawn carriages? No, just as the ACC II rules do not prohibit anyone from buying, owning, or operating gas-powered vehicles at any time. Just as there will be in the coming years, there was a period where both technologies coexisted as a societal transition was made, encouraged by visionary government officials. The major automobile manufacturers have made it abundantly clear that the technological shift from internal combustion engines to electric motors is well and irreversibly underway. The question is whether we will impede this shift in Delaware by maintaining current conditions in which many EV models are largely unavailable for purchase within the state, or whether we will facilitate the shift by adopting the ACC2 and signaling to automakers that we are open for their new business and to a rapidly growing segment of Delaware consumers that their needs are being addressed. I have owned an EV for the past five years. We chose to buy a Chevy Bolt, because it was the only EV with a suitable range available at a Delaware dealer at the time. I also live in a condominium in Newark with a parking garage where no charging facilities have been available. For most of that time, we were the only residents of the building with an EV, and we were fortunate to be able to charge our car at work at the University of Delaware. However, about 18 months ago, interest in EVs among our residents spiked, and we began to explore installing EV chargers in our parking garage. Ten of the 54 units in the building have signed up to use our new chargers, which are about to become operational. And based on our initial survey of our residents, we expect this number to double within the next two to five years. I believe this experience is indicative of the interaction between consumer demand and infrastructure availability. They feed off each other in a virtuous spiral, once enough early adopters have taken the risk. This is where we are poised today. As an experienced EV owner, I have no doubt that Delawareans will quickly come to recognize the advantages of this technology, just as they recognized when it was time to replace the horse and buggy. I'm grateful that prior leaders had the wisdom to prevent our ancestors from being mired in horse manure. I hope our current leaders will have the same foresight and adopt the Advanced Clean Car rules. Reference: "We traded carriages for cars — let's embrace the next disruption," Stephen Carlisle (president and managing

director of General Motors Canada), The Globe and Mail, April 28, 2016. <https://www.theglobeandmail.com/report-on-business/rob-commentary/we-traded-carriages-for-cars-lets-embrace-the-next-disruption/article29782316/>