

Subject: Public Hearing Comments

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From: DoNotReply@delaware.gov

To: HearingComments, DNREC (MailBox Resources), Spectrum_DE@Yahoo.com

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

Name: Gwendolyn Jones

Phone: 3026845373

Email Address: Spectrum_DE@Yahoo.com

Organization:

Comments:

To Whom It Will Concern, including Theresa Newman, DNREC Office of the Secretary: No one advocating ZEVs, certainly not DE gov'r John Carney nor the DE legislature, seems to have considered addressing the elephants in the room; the inability of the existing DE electrical power grid to adequately handle the additional load of charging ZEVs, especially during peak demand periods. I'm sure that everyone has noticed the "high electrical demand expected – please limit your electric use" announcements from the power companies during typical peak use periods. These warnings come with our existing demand. Now, add the booming home and commercial construction, and with gov'r Carney's ZEV mandate, and we have the ingredients of a perfect storm. CA (gov'r Gavin Newsom) has mandated ZEVs, and that state has regular "rolling brownouts" or worse, blackouts. Gov'r Carney has decided to follow their lead, indicating a number of fundamental flaws in his ZEV mandate plan and a profound failure to consider myriad negative repercussions. Yes, DE electrical grid can be upgraded and the costs shared by everyone, regardless of whether they have or use ZEVs. In my own power bill from Delmarva Power (Delmarva Connect), I have seen a slow steady rise, and presumably merely predominantly due to rising costs of power generation. I can only imagine similar cost increases if the DE electrical grid is required to upgrade to meet the additional demand to support charging all the ZEVs, even if spread over time and graduated with gov'r Carney's ZEV mandate timeline. The electrical generation is, or certainly will be, another problem needing resolution. While a sizeable amount of DE's electrical supply comes from nearby (Calvert Cliffs?) nuclear power plants, existing fossil-fueled power plants such as the (COAL-FUELED!) Indian River plant in Sussex County are also used for the additional loads during peak demand periods. With the added loads of ZEVs, those or similar plants will see increased usage, and/ more power plants required; both of those options will result in increased fossil fuel emissions. Even the most wildly optimistic projections of "green" energy sources such as solar and wind, aside from their own significantly higher cost/kWh, can and will not, now or in the foreseeable future, be able to fill the gap, and their highly variable output dependent on time of day and weather. (read: increased costs and fossil fuel emissions) Those that may never use, want or need a ZEV, will nonetheless be forced to pay for those additional costs, regardless if gov'r Carney's ZEV mandate, via the questionable tactic of bypassing the DE General Assembly by empowering DNREC to enforce it unmitigated, or even struck down with the various litigation which is sure to follow. The whole point of my objecting to the ZEV is, there's no consideration of whether a person or people actually want or need a ZEV; the problems, issues, concerns and questions, such as: 1. Purchase cost. 2. Range and the related issue, 3. Greatly increased long-distance travel times due to needing to recharge (mostly an issue for those driving long distances.) 4. Safety (very difficult to extinguish battery fires and the dangers to the passengers, bystanders and emergency response personnel). 5. Battery life and declining battery performance with age and the related issue, 6. Significant cost of battery replacement, often exceeding the value of the vehicle. 7. Reduced cold weather performance, both in power and range. 8. Huge reduction of towing performance, specifically, range. 9. Environmental and human impact, not only on the areas where the materials are sourced, but locally as well, with no – or severely limited – battery recycling infrastructure. I also have major issues with "mandates", especially those with no consideration or planning for how to deal with the myriad associated negative economic and infrastructure repercussions to the people. The market demand, depending on individual interest, should be allowed to naturally and gradually integrate ZEVs into common usage with all the required infrastructure. Instead of a blanket, statewide one-size-fits-all ZEV mandate, since the state and its various county agencies own and operate fleets of vehicles, why not first convert those fleets to ZEVs? That includes any types of vehicles already included in the current ZEV mandate, especially those owned and operated by gov'r Carney and the state and county legislators. We

would get 1st-hand public reports of how they operate, their cost/benefit ratio over time and under actual use. The efficacy of ZEVs and any personal experiences and impressions, good or bad, especially by those wanting to impose their own agenda onto the rest of us. Those will (should) be taken into consideration prior to the decision to expand the proposed statewide ZEV mandate. Are buses, including school, and presumably, any other similarly large/heavy vehicles like snowplows and other construction and/ maintenance vehicles, farming and agriculture equipment, and medical, fire equipment and police vehicles, and smaller vehicles such as motorcycles, trikes, boats, lawn equipment, being mandated for replacement to ZEVs too? If not, why not? As a perfectly viable, already existing, well-proven alternative, both cheaper to purchase and maintain (at least, in the long run), with current support infrastructure and already well-established track record, I strongly suggest and recommend using hybrid technology vehicles instead. They can and do already have both the long range, lower emissions, and avoiding all the downsides of ZEVs. What works for the largely and highly urbanized Wilmington, DE metropolitan area does and will not necessarily work for the DE area south of "the Canal", especially, Sussex County! With Delaware's already meeting or exceeding the current EPA standards for air quality, gov'r Carney's ZEV mandate is a solution in search of a problem; it is plain that gov'r Carney is preparing for the impending end of his last term in office as DE gov'r and padding his path to yet another gov't position by climbing upon the backs of DE residents to do it. The DE canal separating the Wilmington area from the rest of DE might just as well be a gulf as wide as the distance between CA from DE. Gov'r Carney's bass-ackward "ZEV mandate" plan places the cart before the horse, and unless and until all the unresolved associated issues are adequately addressed, will be a disaster at the expense of the DE citizens.