

Bill Melloy

I am writing to express my strong opposition to the proposed Advanced Clean Car II Rules. The proposed 2027 target does not allow enough transition time for success. Many obstacles to the over-aggressive 2027 target exist, including infrastructure and the cost of purchasing an EV, as well as public acceptance and confidence. A longer period for transition is necessary for success.

The sales of Electric vehicles have remained flat. Reports indicate the top consumer concerns are the ability to produce/supply ample electricity for increased demand, the lack of charging station availability, the cost of ownership, the travel distance per charge, and time required to charge, to name a few.

Other obstacles to the target date include the auto manufacturer's ability to produce enough electric vehicles to meet the inventory targets for those states that implement similar regulations. Many auto manufacturers are scaling back their investments in EVs due to a lack of demand. Implementing the Advanced Clean Car II Rules will negatively affect businesses in New Mexico that will be required to inventory low-demand vehicles and limit the number of sales to New Mexicans who are still uncomfortable with electric vehicles. One auto manufacturer has already warned that they will not allocate inventory of gas vehicles to states with strict regulations unless it's a sold order. Charging equipment manufacturers/suppliers are also overwhelmed with early orders and are struggling to meet demand/supply charging equipment. Demand for this equipment has not yet peaked; increased demand will surely compound delays. One study reported a need for 13,000 charging stations are needed in New Mexico by 2027 and there are currently only 615 publicly available. These delays will set back the progress of reliable infrastructure and negatively affect consumer confidence in electric vehicles.

In summary, while I support a transition to cleaner vehicles, the timeline for the Advanced Clean Car II rules is too aggressive. Thank you for listening to my concerns.