

October 20, 2023

The Honorable Phil Murphy  
Governor of New Jersey  
The State House  
P.O. Box 001  
Trenton, NJ 08625

RE: DEP Docket No. 01-23-07 Advanced Clean Cars II Program; Low Emission Vehicles; Diesel Powered Motor Vehicles; Gasoline Powered Motor Vehicles; Model Year 2027 or Later Heavy-Duty New Engine and Vehicle Standards and Requirements; Advanced Clean Trucks Program Proposed Amendments

Dear Governor Murphy,

On behalf of the undersigned organizations, representing rural and agricultural interests across New Jersey and nationally, we write in firm opposition to the Advanced Clean Cars II (ACC II) proposal. ACC II would require manufacturers to phase out gas- and diesel-powered vehicles by 2035. This proposal effectively bans internal combustion engine vehicles.

### **Impact of ACC II on Rural and Agricultural Communities**

New Jersey's rural and agricultural communities will be hardest hit by the ACC II proposal. Internal combustion engine vehicles are a necessary part of everyday life for rural Americans, where it's not an easy task to find an electric vehicle charging station.

As of 2022, more than 833,400 New Jersey residents live in rural areas at the fringes of the state. These areas take up the majority of the state's landmass and comprise most of the state's farmland. There are nearly 1,000 public electric vehicle charging stations statewide, but it is unclear how many of those are located in convenient and accessible areas for rural residents.

Food and agriculture is New Jersey's third largest industry, behind pharmaceuticals and tourism, bringing in billions of dollars in revenue to the state. Nationally, New Jersey is one of the top 10 producers of blueberries, cranberries, peaches, tomatoes, bell peppers, eggplant, cucumbers, apples, spinach, squash, and asparagus.

Rural residents suffer the most from the effects of an aging power grid, as external factors like heavy winds, snowstorms, and over-usage of electric circuits by urban/suburban areas impact transmission. In particular, thousands of residents in rural towns along the Jersey Shore and South Jersey suffered multiple outages in the last few months due to these vulnerabilities.

Mandating electrical vehicle use in sparsely populated areas where the power grid is already fragile will be a huge burden on rural constituents.

### **Impact of ACC II on Energy Infrastructure**

ACC II will massively increase demands on the New Jersey power grid, which will inevitably lead to higher utility costs for residents who already pay some of the highest electricity rates in the country.

If the power grid and related infrastructure isn't ready to absorb the demands of thousands more electric vehicles hitting the highway every year, the state could lose its grid reliability and be subject to more frequent outages.

For example, in California, despite being a top producer of electricity, residents still experience frequent and arbitrary power outages. For example, over 100,000 homes and businesses throughout southern and northern California suffered power outages from a winter storm in February 2023. Public utilities had to tell their customers that these outages would last several days. If California, the initiator of ACC II, can't handle the increased demands on its energy infrastructure, it seems unreasonable to think that New Jersey would be able to.

### **Impact of ACC II on Consumers**

The state's most recent electricity rate hike will raise electricity bills by as much as 7 percent, depending on the provider. Mandating electric vehicles by 2035 will place more demand on the power grid but will do nothing to increase the supply of electricity. Simple economic theory shows us that an increase in demand without a correlating increase in supply only results in higher energy prices.

Further, the cost of the electric vehicle itself is burdensome to most New Jersey residents. The base price for a 2023 Ford F-150 Lightning starts at \$61,869, while the suggested retail price of a traditional 2023 Ford F-150 is just above \$43,000. Going beyond that initial price tag, reporting by *MotorTrend* found that it can cost up to an estimated \$18,000 to install Ford's solar-powered home charging system<sup>1</sup>.

Due to the reasons outlined above, the undersigned organizations request the Murphy Administration abandon the ACC II proposal. A one-size-fits-all approach from California does not, in fact, fit the needs of New Jerseyans. Our organizations stand in firm opposition to ACC II but do stand ready to discuss other ways the Murphy Administration can reach its emissions reductions goals without disproportionately affecting the third largest economic driver in the state and its rural residents.

Sincerely,

The Rural & Agriculture Council of America  
Mid Atlantic Soybean Association  
Northeast Agribusiness and Feed Alliance  
Northeast Dairy Producers Association

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<sup>1</sup> Seabuagh, C. (2023, January 27). For Us, It'll Cost \$18K to Power a House With Our Ford F-150 Lightning. *MotorTrend*. Retrieved October 4, 2023, from <https://www.motortrend.com/reviews/2022-ford-f-150-lightning-yearlong-review-update-1-sunrun-backup-power/>.