

Attn: Mark Page  
Department of Environmental Protection  
59-17 Junction Boulevard, 13<sup>th</sup> Floor  
Flushing, NY 11373

May 31, 2023

**RE: Request for Variance from Idling Law**

Dear Sir/Madam,

The purpose of this letter is to respond to the recent hearing and add some additional notes:

- We have been working with our builder on the feasibility of electric armored trucks (EVT) for use by us. To date the bulk of the electric vehicles they have built are light duty Ford Transits. The range for these units is 100 miles. They also built an electric vehicle on heavier grade chassis but even with a larger battery, the additional weight has kept the range in line with the lighter duty vehicles. (100 miles). Due to Shields operating out of a single location in South Jersey the average route mileage is 225 miles per day. The current electric vehicles cannot meet the power requirements.
- The national providers have approximately 20 locations to dispatch from within Shields operating geography which gives them the advantage of having less power requirements and ability to use the current available EVT's.
- Shields is currently working on a truck design that would eliminate the need for idling by adding a second battery and HVAC unit that would keep the climate stable while the engine is off. This would also require that the current battery could run the existing devices without depleting the battery which drives the ignition. Our builder is currently modifying our truck design to incorporate this and testing whether both batteries can provide the power needed.
- We currently have a chassis scheduled to go into production in the next few weeks. I am confident that we will be able to apply this technology to this new vehicle. If things go to plan, I expect we could look to deploy this vehicle in early 2024. We are committed to making this technology an integral part of our design going forward once we have worked out any issues. In talks with our builder, they believe that the battery capacity will continue to improve over the next few years. Which may allow us to move to EVT's.
- We are also in the process of seeking a second dispatch office in NJ that will be north of our current location. The decreased distance will help make an EVT viable. We are hoping for this new location in 2024.

Recipient Name

Date

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Shields has been in business 54 years and currently employs 100 full time employees. We continually strive to be efficient and are conscious of the climate impact. Three years ago, we eliminated the use of paper documents for the transferring of custody by using bar coding technology and handheld scanners reducing paper consumptions significantly. We are committed to EVT deployment once we can solve the distance issue. In the meantime, the new trucks design with the additional battery and HVAC is a great step in reducing emissions. We need some time work our any issues and test the performance.

Thank you for your consideration and we look forward to hearing a favorable response from your office. Please do not hesitate to reach out to me directly with any questions or additional information you need.

Thomas J. Raftery  
Chief Operating Officer