

From: [REDACTED]
To: [Clean Cars](#)
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The current Clean Car Standard doesn't address the RUC issue for PHEVs and BEVs.

I believe the standard itself will work to effectively encourage uptake of lower emissions vehicles on average, but without addressing the non-linearity between the amount of road tax a fuel efficient vehicle pays vs a PHEV/BEV for the same distance, this will become an effective disincentive for these vehicle types.

With the current structure and fuel prices, a 4L/100km fuel efficient hybrid will pay around 8c/km for petrol while a 20kWh/100km EV will pay 0.5c/km for energy and 7.2c/km for RUC. This means that both vehicles end up costing the same amount to run, while potentially receiving the same up-front discount from the CCS scheme, despite the BEV resulting in 5x lower emissions per km, significantly lower total lifespan emissions and using locally generated energy which significantly reduces our reliance on imported petroleum products. The BEV contributes nearly 2.5x as much road tax per km driven as the fuel efficient hybrid.

PHEVs and BEVs are the obvious future for reducing transportation emissions. There are no other technologies that allow the same combination of high levels of mobility vs low emissions and most common BEVs meet and exceed the 2025 targets discussed in the standard by a factor of 5, even ignoring any future changes in grid mix.

Given that BEVs are currently more expensive up-front to purchase (and remain likely to be in the foreseeable future), this artificially 'levelled' running cost between the two creates a disincentive to purchasing a BEV.

At the very least, the RUC scheme should be adjusted so that a BEV pays equivalent road tax to the most fuel efficient vehicles available. Anything else cannot possibly be considered 'fair'.