

Report on the Stakeholder Consultations on Draft Delhi EV Policy on 18 December 2018

The Delhi Dialogue and Development Commission, in collaboration with the Rocky Mountain Institute, organised a series of stakeholder consultations for the Draft EV Policy released by the Department of Transport, GNCTD, on 27 November 2018. The consultations were held in four one-hour sessions viz. charging infrastructure, two wheelers, three wheelers, and citizens roundtable. A copy of the event schedule and agenda is attached in Annexure 1.

Comments were invited from all major industry players, and from civil society organisations, under four separate headings of 'support', 'include', 'adjust' and 'clarify'. The present report summarizes and discusses the comments received from the participants under the respective heads. Individual comments received from various participants for each of the four consultation sessions is enclosed in Annexure 2.

1. Charging Infrastructure

a. Support

The participants welcomed the subsidies along with the change in bye-laws in Sec. 4.1.1 to mandate setting up of charging infra. Subsidies for purchase of bulk chargers were also supported. One participant (Chargezone) voiced support for optimizing the battery sizes and time required for charging for public transport to optimize "opex" x "copex" through a complete software.

b. Include

Participants desired to know how battery swapping would operate for vehicles of different battery configurations.

Provision of standards for the following was deemed to be important:

- i. A standard for swappable battery stations must also be devised to certify such stations.
- ii. Minimum standards for public charging infra. including size of stations.
- iii. Battery size and capacity, to ensure sufficient charge for long distance travel. Monopolization should be avoided by avoiding standardization of form factor and chemistry.
- iv. KPIs on battery performance.
- v. Connector standard for 2 wheelers.

Discoms to be given the responsibility of setting up charging infra for public charging, as they can capitalize on their existing facilities and resources including land. This will help to reduce the overall tariff structure in Delhi for all customers. Discoms may also help in identifying hotspots and power availability nodes, e.g. on highways, to anticipate and provide for demand. These hotspots may exist in other infra like hotels, malls, etc.

Participants also advocated for the inclusion of non-fiscal incentives to consumers, such as EV-only lanes during peak hours, special pick up zones outside airports, dedicated routes, etc.

A de-licensed structure for setting up of charging infra was considered efficient as it would spur competition. Permits may be issued, whereby operators will be allowed to add chargers as dictated by the market forces. It was noted that business model innovation for swappable batteries may be facilitated by civil society/ NGOs. Demands were also made for having no restrictions on captive charging infra needs. Further, fast-track approvals for charging infra. is desirable.

A separate regulation may provide for tariff and scheme details, such that a lower and upper cap on pricing may be introduced to benefit the consumer. This may also include time of use pricing, to account for the predictable increase in demand in the evening post-office hours.

Comments were made to give weightage to interoperability in selection of BSOs, through factors such as time to market, pwr/kwh, etc. Further, battery manufacturers desired to participate as BSOs in the bidding process.

Other comments included the need to define single charging stations in the same way as MoP, so OEMs and investors do not have different standards in different cities. The electrification of the BRTS may be included in this policy. Noting that all public chargers should preferably be ultra-fast, participants urged the policy to consider illegal power theft from charging infra.

Further, the policy may consider charging points for e-bus routes and may even merge bidding of public charging for EVs and of battery swapping stations. One participant (TPDDL) desired the ToD to be more aggressive than 20%, so it helps in flattening of demand curve and as such reduces tariff.

c. Adjust

Participants urged that subsidies should exist for batteries and not vehicles, and for usage and not ownership. They should be extended similarly to companies who operate fleets, and not only to individuals.

Multiple participants advocated for the equal treatment of swapping and charging, whereas few commented on the inclusion of multimodal charging stations. The policy may also account for the additional load on discoms and transformers for battery charging, and associated delays and costs. Waiting spaces may also be defined to avoid long queues as seen for CNG stations.

While the policy currently allows for AC001 and DC001 chargers, charging infra may be approved by ARAI that allows for higher capacity chargers too.

Other comments stated that AC001 is not suitable for public charging. A cooperative society like SETWIN may play a mediator's role in lending of batteries.

d. Clarify

- i. Standardization of charging infra guidelines under Central and Delhi policy, including MoP Circular of 14th December – definition of public charging station, and licensing requirements.
- ii. Definition of battery swap, whether individually or third party owned.
- iii. Timeline for setting up charging infra.
- iv. Weightage to parameters for bidding process.
- v. Whether charging operations, including bulk charging, can be developed without bidding process.
- vi. Allotment of land to reduce waiting time for consumers
- vii. Charging for RWAs in apartment buildings.
- viii. Support from current grid for fast charging – especially for simultaneous charging of e-buses (100kWh).
- ix. Whether e-bus charging stations will be economically efficient and sustainable.
- x. Will battery swapping force a FIXED form factor and a FIXED chemistry on the OEMs? This will make the technology obsolete very fast.
- xi. Whether support will be given from municipality, DISCOMs, Metro, etc. for land and power.

2. Three Wheelers

a. Support

Equal incentives for all 3Ws, open permit system for e-autos, and specific focus on 2Ws, 3Ws, and shared mobility was received well by the participants. The latter prevents diversion of subsidies to 4W under the policy.

In addition to subsidies, a group may be formed by the government to meet banks/NBFCs to arrange for financing.

The inclusion of only low speed 3W i.e. e-autos that qualify under FAME was met positively by few participants.

b. Include

Multiple participants pressed on the importance of encouraging retrofitting. Greaves Cotton suggested provision of 50% of FAME Subsidy (RBEV Category) and 50% purchase incentive for 3Ws, up to 30,500/-. Another participant, VR Chaalak, claimed that they had pursued a retrofitting project in Gurgaon with positive results in earnings for drivers, and reduction in noise and pollution.

Comments were also made to include small 4Ws for commercial use/goods carrier eligibility (including LCVs) in the policy. Policy could also provide for upcoming technology in quadracycles. Additionally, HEVs may be important as a bridge between ICE-run vehicles and EVs to continue reduction of pollution.

For funding, hire-purchase schemes may be arranged with the Delhi Finance Corporation. SGST rebates may be provided on battery and EV autoparts. The policy should not mandate swapping, and should rather extend subsidy to all electric 3Ws, since swapping infrastructure is not freely available. Fleet ownership should be treated at par with individual ownership under the policy. It was also suggested that incentives be provided to ultra-fast charging technology for better asset utilization, where one e-auto can be charged in 5-10 mins. These fast charging station may be set up at metro parking, or other premium parking areas.

Honda Cars suggested that older vehicles and other vehicles that emit pollution should be under the scope of 'fee' in the feebate system. While a participant said that usage of charging infra. should be limited to licensed or registered e-rickshaws, others emphasized the importance of curbing of illegal or unregulated e-rickshaws, and safety in last mile connectivity. Yet others commented that EV vehicle should be used for waste collection to increase visibility of the policy.

c. Adjust

Participants encouraged a technologically agnostic approach in the policy and demanded that governmental support in Sec. 3.2 not be restricted to only swappable batteries. AEEE suggested that KPIs should be set to measure performance of batteries. Further, the difference between e-rickshaws and e-autos may be scrapped, and fiscal and non-fiscal incentives may be provided for both.

In Sec. 3.4.2, the provision of Rs. 10/- cashback attracted criticism as it might discriminatorily favour app-based aggregators like Ola and Uber. There was disagreement on whether cashback may be given to the driver instead of the rider, as it might motivate drivers to switch to EV and solve the issue of distribution of cashback in shared rides.

Participants were in favour of a delicensed regime, with fast track approvals. A level playing field for the organised (e-rickshaws) and unorganised sector (auto rickshaws) was advocated for. For this, greater subsidy may be given to e-ricks.

3Ws usually have a life of about 10 to 15 years, whereas the policy provides an incentive for scrapping of vehicles more than 7 years old. Instead, an emission benchmark may help in ensuring that these de-registered vehicles do not get sent to other cities.

Other comments included geofencing for batteries. Uber stated that they should not have to pay 2.5% congestion fee since most Uber vehicles run on CNG, and not diesel. Terra Motors suggested the use of solar panels on top of autos to generate and save electricity. Another participant commented that the landed cost for power should be below Rs. 4/-.

d. Clarify

- i. Stance on CNG vehicles and investment in CNG related infrastructure.
- ii. Difference between e-auto and e-rickshaw.
- iii. Whether permits for autos will be capped, even for aggregators.
- iv. Whether interest subvention is only on vehicle or battery + vehicle.
- v. Whether subsidy will be extended to 3Ws without battery.
- vi. Reason for higher subsidy for e-rickshaws than for e-autos.
- vii. Whether EV goods carriers will be exempt from time of use restrictions upon entry into Delhi.
- viii. Whether batteries with different form factors/ chemistry may be swapped at any swapping station.

- ix. Safety guidelines for handling of lithium ion batteries during swapping procedure.

3. Two Wheelers

a. Support

Participants appreciated the mandate to include charging points in housing societies, and the push for ride-hailing in the policy.

b. Include

Participants proposed that bike sharing, and bike leasing should be included in the policy, and that subsidy may be provided for the same. Importantly, the policy should disincentivise 3rd and 4th vehicle purchases in a single household, and rather incentivise usage. While some participants desired that subsidy may also be extended to low-power L2 type scooters i.e. those below 25 kmph, others demanded that the policy continue to subsidise only high-power scooters as speeds below 45 kmph will lead to congestion. Hire purchase schemes extended by DFC have also been suggested. Further, performance (minimum may be defined at 100 km/kWh) may be linked to subsidy.

The use of schools, colleges, hospitals, etc. for creating charging infra. was highlighted. Similarly, community charging pods must be created in multi-story apartments since 2W charging will happen at home. All charging points can adopt time of the day metering.

Cluster parking may be adopted to ensure decongestion. Non-fiscal incentives are crucial. The policy must address public transport as the most important priority, followed by private buses, cars, 3Ws, scooters, and motorcycles.

Participants also requested a waiver or decrease in SGST on EVs, while also suggesting that GST on battery to be the same as on vehicles.

The registration of bike-taxis must be seamless, with petrol bikes also being added to the fleet.

Amazon suggested that middle mile delivery be carved out as a separate category. EVs should be exempt from entry into Delhi at restricted times.

c. Adjust

Subsidy may be linked to performance rather than as a flat amount. The following was attached for reference:

	EV	ICE vehicle (for reference)
Acceleration (0-20kmph)	4 sec	1.1 sec
Gradient ability	7 degrees	7 degrees
Range	60 km	600 km
Efficiency	5kWh/100 km	60-70kmpl
Warranty	3 year/30000 km	3 year/30000 km

Subsidy should incentivise usage than ownership. Some participants desired for an increase in subsidy to 100% from the current 50%, claiming that this will boost demand for new 110 cc 2Ws. Others stated that in the event the FAME subsidy decreases, the incentive should remain the same to ensure consistency.

In Sec. 3.1.1. and 3.1.2, the policy should remain technology agnostic for fixed battery/ removable batteries, and for swapping and public or private charging. Swapping must be defined in relation to battery performance and range, for e.g. 55 km is the minimum requirement for FAME subsidy.

It was also suggested that funds from parking should be used to support EVs, and that BSOs should be allowed to be distribution points for batteries. Further, one participant opined that the waiver of road tax, registration charges, etc. in Sec. 3.2.2 should be extended to vehicles in BS(IV) and BS(VI) categories too, as these are clean.

A few said that the validity of the deregistration certificate in Sec. 3.2.7 should be left open-ended to allow for consumer freedom.

d. Clarify

- i. Whether lead acid can be supported if cost is a primary factor.
- ii. Mechanism for claiming subsidy for scrapping (Rs. 15000/-).
- iii. Whether any restrictions or exclusivity exists vis-a-vis battery operators and PSO?
- iv. Whether subsidy may be claimed for vehicles without batteries.
- v. Whether definition of 'advanced battery' may be relooked at.
- vi. Whether policy provides for old vintage vehicles.

- vii. Which particular segment is the goal of 25% new registrations related to?
- viii. Guidelines for disposal of batteries.

4. Civil Society

a. Support

Numerous participants iterated that the focus in the drive towards EVs should be on public transport and BRT. Government vehicles, including those of contractors should make the switch to EVs. The policy addresses demand creation to some extent.

b. Include

The policy may provide additional incentives for purchase of EVs with solar roof tops and use of other renewable energy. Leasing of EVs may also be incentivised, keeping consumer demand and visibility of EVs in focus for improving the outcome of the policy. Visibility is crucial to address consumer anxiety about cost, range, etc. Non-fiscal incentives like dedicated lanes for EVs should be considered.

The discoms must be capable of bearing the load from EVs, in relation to the time of charging and ensuring equality in power distribution.

Integration of e-rickshaws and shared mobility on google maps or other common platforms will be beneficial.

Provisions for parking surcharges and spending on research and development into EVs and related technology are also important.

c. Adjust:

NIL

d. Clarify

- i. Whether single platform for environmental matters will be created, for direct communication between citizen communities and Delhi government.
- ii. Whether recycling ecosystem is ready for the implementation of the policy, and if it will be viable.
- iii. Measures undertaken to communicate the urgency of the policy to the citizens.
- iv. Amount of cess for polluting petrol and diesel vehicles.

ANNEXURE 1 - Agenda & Schedule



Stakeholder Consultation on Draft Delhi Electric Vehicle Policy 2018

Organized by

Dialogue and Development Commission of Delhi (DDCD)
in partnership with Rocky Mountain Institute (RMI)

18 December 2018 | NDMC Convention Centre, New Delhi

9:30 - 10:30	Registration
10:30 - 11:00	Making Delhi the EV Capital of India Presentation on Draft Delhi EV Policy 2018 - Smt. Varsha Joshi, Commissioner (Transport), GNCTD Remarks by: Shri Jasmine Shah, Vice Chairperson, DDCCD, Govt. of NCT of Delhi Dr. Ashok Jhunjhunwala, Professor, IIT Madras Shri Kailash Gahlot, Minister of Transport, Govt. of NCT of Delhi Shri Arvind Kejriwal, Hon'ble Chief Minister, Govt. of NCT of Delhi
11:00 – 11:45	Industry Perspectives on Delhi's EV Policy <i>Moderator:</i> Smt Akshima Ghate, Principal, Rocky Mountain Institute <i>Panelists:</i> Shri Kailash Gahlot, Minister of Transport, Govt. of NCT of Delhi Smt Varsha Joshi, Commissioner (Transport), Govt. of NCT of Delhi Shri Chetan Maini, Co-Founder & Vice Chairman, SUN Mobility Shri Sohinder Gill, Director General, Society of Manufacturers of Electric Vehicles (SMEV) Shri Mahesh Babu, Chairman (Electric Mobility Group), Society of Indian Automobile Manufacturers (SIAM)

11:45 – 12:00	Tea break
12:00 – 1:00	<p>Charging infrastructure roundtable</p> <p>Co-chairs - Smt Varsha Joshi, Commissioner (Transport), Govt. of NCT of Delhi, Shri Ashok Jhunjhunwala, Professor, Indian Institute of Technology Madras</p> <p>Moderator: Clay Stranger, Principal, Rocky Mountain Institute</p>
1:00 – 2:00	Lunch
2:00- 3:00	<p>Two wheelers roundtable</p> <p>Co-chairs - Shri Jasmine Shah, Vice Chairperson, DDCCD, Govt. of NCT of Delhi, Smt Varsha Joshi, Commissioner (Transport), Govt. of NCT of Delhi</p> <p>Moderator: Clay Stranger, Principal, Rocky Mountain Institute</p>
3:00 – 4:00	<p>Three wheelers roundtable</p> <p>Chair - Shri K K Dahiya, Special Commissioner, Transport, Govt. of NCT of Delhi</p> <p>Moderator: Akshima T Ghate, Principal, Rocky Mountain Institute</p>
4:00-4:30	Tea break
4:30-5:30	<p>Citizen and civil society roundtable</p> <p>Co-chairs – Shri Kailash Gahlot, Hon'ble Minister (Transport), Govt. of NCT of Delhi, Shri Jasmine Shah, Vice Chairperson, DDCCD, Govt. of NCT of Delhi</p> <p>Moderator: Akshima T Ghate, Principal, Rocky Mountain Institute</p>
5:30-5:45	Concluding session

ANNEXURE 2 – Individual comments received at Stakeholder Consultation on Draft Delhi EV Policy organized by DDC on 18 December 2018

1. Charging infrastructure session

Organization	Comment
Exicom	<ol style="list-style-type: none"> 1. Ministry of Power's 14th Dec guidelines on public charging infrastructure not in line with Delhi's Draft EV Policy – Will the two be independent? 2. ECBC – Would charging points recommendation in Delhi's policy override the ECBC guidelines? 3. No mention of captive charging infrastructure/swapping needs 4. Would subsidies be carried forward in captive charging infrastructure? 5. Ministry has delicensed the setting up of charging infra while the policy has 11 specific zones. Can it be delicensed too?
IX Energy (Check company name)	<ol style="list-style-type: none"> 1. Shouldn't the policy consider fast charging, in particular to avoid long queues at public charging points? 2. Retrofitting EVs – policy should support it 3. Will any land be allocated by the Delhi Govt. for charging infra? 4. Will specifications be given for size of battery packs?
SUN Mobility	<ol style="list-style-type: none"> 1. In bids for BSOs, give weightage to and include parameters like throughput, inter-operability, experience of service provider, etc. 2. Power demand will be low even with 25% target for EVs 3. Technology will help balance grid (night time charging)
Bajaj Auto	<ol style="list-style-type: none"> 1. Would govt. support on-board charging? – Look at on-board charging and battery swapping equally 2. Create level playing field – consider all categories of 3Ws 3. What kind of distance is being considered between swap stations – would have bearing on charge needed before you swap (100 km charge may be needed before you swap) 4. Multiple operators for BSOs would be a challenge from the perspective of protocol/battery standardization 5. Battery chemistry – need freedom from over-standardizing. Don't standardize because it should not become monopolistic
EV Motors	<ol style="list-style-type: none"> 1. Support/promote fast charging infrastructure
PowerGrid	<ol style="list-style-type: none"> 1. AC 001 charger included in Policy is more suitable for private

	<p>use</p> <ol style="list-style-type: none"> 2. Consider multi-modal charging stations (with battery swapping, DC charging) to reduce operational cost of charging stations 3. Focus on housing societies for battery landing schemes for individuals/private vehicles 4. Need to unman swapping stations 5. E-bus – not addressed in policy from charging perspective
Ather Energy	<ol style="list-style-type: none"> 1. Lot of more focus needed on DC fast charging for TWs. 2. Individuals should be allowed to charge at home, to relieve pressure on industry.
Ola	<ol style="list-style-type: none"> 1. Swapping and charging should be treated at par 2. Subsidize usage, not ownership, not infrastructure 3. Avoid giving exclusive licenses for setting up charging/swapping infrastructure 4. Give equal focus on non-fiscal incentives
Chargezone	<ol style="list-style-type: none"> 1. Don't license – don't give exclusive rights – 2. There must be a discussion with DISCOMs for hot points of power and infrastructure and interjection with highways – hotspots matching with traffic and electric highways 3. Can develop a software on what kind of battery size would be appropriate for e-buses – optimizing battery size
Exicom	<ol style="list-style-type: none"> 1. Will guidelines be issued for captive charging infra?
TERI	<ol style="list-style-type: none"> 2. Why only 3 BSOs? 3. EOs are free to price – Shouldn't there be lower/upper caps 4. Bharat chargers not recognized by BIS – we should take care that the infrastructure doesn't become redundant
TATA Power	<ol style="list-style-type: none"> 1. Time of Day pricing can be built more aggressively in policy 2. Staggering demand with Time of Demand
Bharat Petroleum	<ol style="list-style-type: none"> 1. PESCO – not keen on batteries – explosives concern 2. Subsidy on only chargers or bulk chargers? 3. If we are not participating in bid, would we still be able to provide charging solutions?
SIAM	<ol style="list-style-type: none"> 1. Focus on public transport; electrifying BRTS corridors
Magenta Power	<ol style="list-style-type: none"> 1. Special tariffs – electric vehicle billing meter not included in policy – DERC should come out with regulation

	2. 14 th Dec notification of MoP – definition of public charging infrastructure
SmartE	1. Need to liberalize charging infrastructure 2. How do we address misuse of power/charging infrastructure?
NTPC	1. Set-up charging infrastructure through discoms for buses at DTC depots 2. Delhi govt should take lead
Greaves Cotton	1. Need for standard for swappable batteries also, for safety purposes.
Grisha	1. How will policy promote charging in CGHS/apartments/group housing societies
DIMTS	1. Strengthening of grid needs attention
CEEW	1. Equivalent Car Spaces clarification – in the context of charging for TWs

2. Three Wheelers Session

Organization	Comment
Expereal	1. Scrap the difference between e-autos and e-rickshaws. 2. Policy should include quadricycles.
Uber	1. How does the policy differentiate between erickshaws and e-autos? 2. Will the permits override the limit on number of permits for delhi? 3. Is interest subvention only for vehicle price or vehicle plus battery cost? 4. Erickshaws work on share basis and thus may make cashback of Rs. 10/- per rider difficult to dispense.
Greaves Cotton	1. Policy may include in Sec. 3.2 that subsidy will be provided for retrofitting in rickshaws. 2. Policy may provide 50% purchase incentive in three wheeler passenger category.
Kinetic Green	1. Eautos and e-goods carriers must also be given subsidies. 2. Swapping infra will take at least 2 years to develop. 3. Under FAME, category of Low Speed Three Wheelers exists and similarly, erickshaws of particular quality should be subsidised.

	<ol style="list-style-type: none"> 4. Policy may include LCVs and quadricycles under its ambit. 5. A Committee may be made to engage with the financiers who may have reservations on resale value, battery life, etc. 6. Visibility can be increased if waste collection vehicles can be made EV.
Ola	<ol style="list-style-type: none"> 1. Subsidise use and not ownership. 2. Non-fiscal incentive like access to premium parking spots for erickshaws will be crucial.
CEEW	<ol style="list-style-type: none"> 1. Cashback scheme for app-based aggregators' last mile connectivity may be discriminatory since Ola and Uber dominate the market, and govt must not nudge towards them. 2. Last mile connectivity may exist through any means of transport, and policy must account for that.
CII	<ol style="list-style-type: none"> 1. Swapping should be given a level playing field and not made mandatory.
Bajaj Auto	<ol style="list-style-type: none"> 1. Swap Model works when there are at least 75% more batteries than vehicles. 2. Mechanism for swapping should be clarified to maintain compatibility, security. 3. The weight of battery, mounting, etc. for EVs is different from petrol/diesel vehicles, and thus the latter cannot be retrofitted.
Tata	<ol style="list-style-type: none"> 1. In reference to Sec. 3.6 of the policy, 4 Wheeler goods carrier also exist, similar to 3 Wheeler Gods carrier. 2. Policy may also provide subsidy to private bus operators.
EV Motors	<ol style="list-style-type: none"> 1. Lithium ion is combustibile. Policy must define proper charging methods to avoid any fatalities.
Goldie Tech	<ol style="list-style-type: none"> 1. Policy must account for innovations like battery powered cycle rickshaws.
TERI	<ol style="list-style-type: none"> 1. How important does the transport dept consider the training of erickshaw drivers? 2. Policy may consider continuance of vehicles which are seven years or older, since they need not all be energy inefficient or overly polluting, instead of scrapping.
Amazon	<ol style="list-style-type: none"> 1. Will traffic restrictions on goods carriers' movement be removed if compliance with the policy occurs?
India Mobility Finance	<ol style="list-style-type: none"> 1. Instead of giving incentive to driver, where driver will keep the margin, an app can facilitate transfer of cashback to the rider directly.

3. Two Wheelers session

Organization	Comment
CSTEP	<ol style="list-style-type: none"> 1. Scrapping subsidy – what will be the mechanism for gauging the amount of subsidy? 2. What will be the mechanism for qualifying for top-up incentives? 3. How to determine ‘swappable battery vehicles’ since batteries may become swappable later on?
HERO MotoCorp	<ol style="list-style-type: none"> 1. TWs equivalent to 100 cc – don’t call them ‘high power’. It is not defined like this. Rather use definition based on performance. 2. Consider 100% subsidy to cover cost differential for high performance TWs rather than 50% 3. Be technology agnostic between swapping and fast charging 4. In case FAME goes away, level of incentive should be matched 5. New vehicles which are cleaner should not be taxed 6. Scrapping and de-registration incentive – validity should be left open-ended
WRI	<ol style="list-style-type: none"> 1. How to increase visibility of TWs? 2. App-based vehicles – bike sharing and bike leasing should also be included – can help in planning of charging locations 3. Disposal of batteries?
Ather Energy	<ol style="list-style-type: none"> 1. Need more players – no one company should have undue advantage 2. Why would you push swapping harder than charging? 3. Why are subsidies focused only on high performance vehicles?
Ola	<ol style="list-style-type: none"> 1. Focus subsidy on use rather than ownership 2. Better to subsidize battery rather than vehicle 3. Discrepancy in GST – vehicle and battery 4. Allowing ride-hailing - a welcome step 5. We should ensure that benefits for individuals and fleet are same 6. Also promote non-fiscal incentives – EV lanes during rush hours, special pick up zones at airports, etc.
Magenta Power	<ol style="list-style-type: none"> 1. Give level playing field for charging and swapping 2. Any model for housing societies to install community charging

	spots?
Greaves cotton	1. Can Delhi govt give subsidy to low-speed TWs with lithium ion batteries (L1 scooters under 27 th Sept. FAME Circular)?
22Kymco	1. Taiwan experience – sockets everywhere 2. Range anxiety is more about waiting period – only plausible solution is battery swapping 3. Swapping needs to be defined – replacement is not swapping – how does one become eligible for swapping incentive? – 55 km range clause of FAME may be problematic
TERI	1. Focus on TWs for commercial use 2. Have subsidy for leasing of vehicles 3. Don't encourage further ownership of private vehicles
Uber	1. Need to have petrol bike taxis also 2. Commercial registration for bike taxis needs to be seamless 3. Cash back proposed for last mile should go to driver, not to the passenger 4. Give impetus to first 1000 bikes
URJA	1. No action on parking policy by govt – regulations needed on cluster parking for decongestion
WRI	1. Policy may provide for disposal of batteries.
Hero	1. Validity of deregistration certificate may be left open ended for greater consumer freedom.
Bajaj	1. Speed of vehicle should be considered to qualify the power rating of TWs – consider above 45 kmph 2. Subsidy for fixed battery? – TWs are not doing a lot of kms – so they may not need battery swapping 3. AC001 will be ideal 4. Swapping – battery pack has to be designed with vehicle – can't have 2W and 3W in same pool; don't mix batteries; OE should handle the swapping
Amazon	1. Include small e-LCVs in policy 2. E-commercial vehicles should be exempted from no entry timing for commercial shipment 3. Supportive of mandates but there should be a time lag
Flipkart	1. Consider including low-power TWs 2. Can hire purchase scheme be extended to delivery boys (for TWs) like in case of e-rickshaw scheme 3. Mandates will help along with incentives and financial model

CUTS	1. Which segments targeted for 25% share?
SIAM	1. Funding of scheme – instead of new vehicles, may be better to charge old polluting vehicles or else look at annual tax (registration tax) 2. Waiver of SGST? 3. Advance battery definition vague in the policy.
GATI	1. No harm in mandating – OEMs and financial institutions need to come together

4. Citizens Session

Organization	Comment
ITDP	1. Focus in National Urban Transport Policy is on people, whereas of this policy is on vehicles. 2. There should be a reprioritisation of road use – first for buses, shared mobility (erickshaws, gramin sewa), freight vehicles, and then private vehicles. 3. Policy is providing high subsidy in addition to the foregone rent on scarce resource of land. 4. The funding should be diverted towards procuring buses and shared mobility, rather than subsidising private vehicles.
C-STEP	1. People will charge when most convenient. The policy must account for the load on electricity with ACs, Heaters, etc. running along with the chargers. 2. Colonies in Delhi are not designed to even include parking spaces, how will charging spots be created?
TERI	1. Policy must consider commercially viable recycling systems to process material after scrapping and deregistration. 2. Incentives may be provided for leasing models also, as it exists for ownership now.
CUTS	1. Consumer anxiety about cost of EV battery and range must be addressed. 2. Consumers should be appealed to by raising awareness on the benefits of EVs and their contribution in saving the environment.
NTPC School of Business	1. Unless EVs are charged through renewables, dependence on thermal energy will continue to pollute the environment.
Chargezone	1. Policy may include leasing – In the USA, maximum EVs are used based on a leasing model.