

Prepared by:

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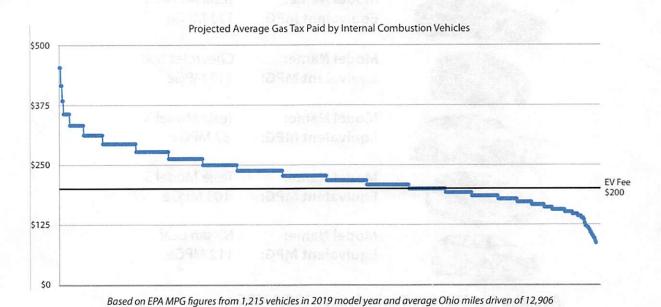
The electric vehicle (EV) surcharge specified by House Bill 62 overcharges owners of electric vehicles, based upon fuel equivalent consumption of mass market EVs. Traditionally, the gas tax is a consumption tax that naturally impacts inefficient vehicles more than efficient vehicles. In the case of the proposed EV surcharge, this corrolary that otherwise exists with all other classes of vehicles is disregarded.

The current proposal charges EV owners significantly more than would be paid by many conventional internal combustion models, including traditionally less efficient models such as large sedans and small SUVs. Charging EV owners at a higher rate than is paid by many mainline internal combustion engines is inconsistent with this consumption tax, and inequitable.

Based on average miles driven by Ohio drivers, and the average MPGe of electric vehicles, a fair share fee for EV drivers would be \$54.57 per year (see calculations below). The current proposal at \$200 would require the driver of an EV to drive more than 46,000 miles per year based upon the average MPGe of the top selling EVs. The \$200 proposed fee overcharges EV drivers and penalizes an emerging technology which is being produced and developed by numerous major manufacturers/employers in Ohio.

Consumption Equivalent Price Calculation:

Average MPGe of top 5 selling EVs: Average Miles/Year Driven by Ohio Drivers: Fuel Tax Proposal: Implied EV fee: 108.8 MPGe (source: US Dept. of Energy) 12,906 (source: US Dept. of Transportation, 2015) \$0.387 per gallon (source: HB 62) \$45.91



A selection of internal combustion vehicles and their estimated gas tax @ \$0.387/gallon based on EPA MPG figures at 12,906 average miles driven by Ohio drivers:

\$86.11	Ford Fusion Hy	\$118.92
\$89.19	Chevrolet Cruze	\$134.99
\$96.05	Honda Fit	\$138.74
\$96.05	Honda Civic	\$138.74
\$99.89	Toyota Corolla	\$138.74
\$104.05	Jaguar XE	\$138.74
\$108.58	Hyundai Elantra	\$142.70
\$113.51	Toyota Yaris	\$142.70
\$118.92	Nissan Versa	\$146.90
	\$89.19 \$96.05 \$96.05 \$99.89 \$104.05 \$108.58 \$113.51	\$89.19 Chevrolet Cruze \$96.05 Honda Fit \$96.05 Honda Civic \$99.89 Toyota Corolla \$104.05 Jaguar XE \$108.58 Hyundai Elantra \$113.51 Toyota Yaris

A selection of internal combustion vehicles that will pay less than EV owners based on EPA MPG figures and average miles driven by Ohio drivers:

Infinity Q50	Audi A
Mercedes E 300	Audi A
Toyota Avalon	Cadilla
Chevrolet Impala	Lexus
Mercedes AMG GLA	VW Tig
Ford F150*	Range
Ford Transit Van*	Audi T
Nissan NV200 Cargo Van*	Merce
Buick Envision*	Merce
Ford Edge*	BMW :
Hyundai Santa Fe*	Buick
Hyundai Tucson*	Chevr
Jeep Renegade*	Lexus
Porsche Boxster	Lexus
Porcsche Cayman	BMW :
Porsche 911 Carrera	Ford E
Chevrolet Camaro	Jeep (
Ford Mustang	Jeef C
Infinity Q60	Acura
Cadillac ATS	Infinit
Genesis G70	Audi A

46 A7 ac CTS NX 300* guan* Rover Evoque* edes AMG CLA edes CLS 450 X2* Regal rolet Malibu ES 350 GS 300 Escape* Cherokee* ompass* TLX ty QX30*

BMW 530i Volvo S90 Volvo V90 **Buick Encore** Infiniti QX50* Mercedes GLA 250 Volvo XC40* Acura MDX* BMW z4 Mercedes A 220 Acura ILX Jaguar XE Volvo S60 Acura RLX Jaguar XF Cadillac CT6 Volvo V60 Buick Encore^{*} Chevrolet Equinox* **GMC Terrain*** Mazda CX-5*

Audi A3 Mazda CX-3* Mercedes CLA **Buick Lacrosse** Subaru Legacy VW Passat Nissan Rogue⁴ Jaguar F-Pace* Subaru Crosstrek Subaru Forester* Mazda MX-5 Fiat 500 Mini Cooper Ford Fiesta Lexus LC 5000h Audi A4 BMW 3 series Hyundai Veloster Nissan Versa Nissan Altima Nissan Sentra

Subaru Impreza Toyota Corolla Honda Accord Honda HR-V* Honda CR-V* Hyundai Kona Tovota RAV4* Lexus RX AWD* Chevrolet Sonic Mazda CX-3* Hyundai Sonata Kia Optima Honda Fit VW Golf Lexus NX Chevrolet Cruze Honda Civic Hyundai Accent Kia Rio Chevrolet Malibu Jaguar XE

Kia Forte
Mazda2
Mitsu. Mirage
Lexus UX
Ford Fusion Hy
Hyundai Sonata Hy
Kia Optima Hy
Lincoln MKZ Hy
Toyota Avalon Hy
Lexus ES
Toyota Prius
Toyota Camry Hy
Honda Insight
Kia Niro
Hyundai Iconiq Blue

Gas Mileage Equivalency of Top 5 Selling Evs in 2019



Model Name: Te Equivalent MPG: 12

Tesla Model 3 123 MPGe

Model Name: Equivalent MPG: Chevrolet Bolt 119 MPGe

Model Name: Equivalent MPG: Tesla Model X 87 MPGe

Model Name:

Tesla Model S

Equivalent MPG:

103 MPGe

Model Name: Equivalent MPG: Nissan Leaf 112 MPGe

Average Gas Mileage Equivalency: 108.8 MPGe

^{*} Sport Utility Vehicle, Crossover, Truck, or Van

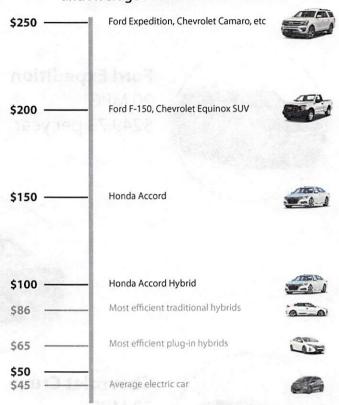
EV Recommendation:

If the State continues to assess roadway use tax as a consumption-based gas tax, then new fuel-efficient technologies should be taxed at a rate which corrolates to consumption. A \$45 per year fee would correlate to consumption for the average electric vehicle on the market today.

If the State wishes to require a minimum charge on all vehicles regardless of consumption, then a fee should be considered that is inline with the most efficient non-plug-in internal combustion vehicle. In 2019, the Hyundai loniq is the most efficient internal combustion vehicle without any additional outside energy inputs, and would pay a total gas tax of \$86 based on average miles driven in Ohio.

As this is a new fee to EV owners, the State should consider phasing the fee in over two years, similarly to the gas tax phase-in.

Expected Gas Tax Receipts Based on Average MPG and Average Miles Travelled in Ohio:



Plug-In Hybrid Recommendation:

Efficiencies of plug-in models vary widely, from being as or less efficient than the most efficient internal combustion engine (ex. Volvo XC90, Mercedes GLE), to being as or more efficient as some full EV models (ex. Prius Prime). A flat fee formula is difficult to apply rationally and equitably to plug-in hybrid models. The average of all 2019 plug-in hybrids on market is 86.54 MPG, equiv. to a \$57 gas tax. This flat fee proposal suggests a phased-in fee of \$30 to compensate for the difference between the average plug-in hybrid and the most efficient internal combustion engine vehicles.

Recommendation - Electric Vehicles:

Proposed EV Fee, Year One:

Proposed EV Fee, Year Two: \$86

Proposed EV Fee, Future Years: Calculate Based on most efficient internal combustion

model in market

Recommendation - Plug-in Hybrid Vehicles:

Plug-In Hybrid Fee, Year One: \$15

Plug-In Hybrid Fee, Year One: \$30

Plug-In Hybrid Fee, Future Years: Calculate Based on half of EV fee.

Exhibit: A Sampling of Annual Gas Tax by Vehicle Based on \$0.387 gas tax, 12,906 Ohio average miles driven, and DOT fuel efficiency stats



Ford Expedition 20 MPG \$249.73 per year



Ford F-150 25 MPG \$199.78 per year



Chevrolet Cruze 33 MPG \$151.35 per year



Honda Civic 36 MPG \$138.74 per year



Toyota Prius Eco 56 MPG \$89.19 per year