

To Whom It May Concern,

egee is a peer-to-peer electric car sharing platform which has been operating in Australia since 2016. We allow owners of electric vehicles (EVs) from across Australia to rent out their cars when they are not in use. This contributes to the sharing economy and provides additional income to the vehicle owners. egee is helping to accelerate the adoption of EVs in Australia, allowing more people to experience driving an electric car, encouraging many to go on and purchase their own EV.

Tasmania is a growing market for us, and we see a good opportunity as national and international tourism starts to open up. With Tasmania's strong environmental credentials, we are excited to see how egee grows in the region as more people look for greener transport options whilst visiting the region.

With this in mind, we would like to submit a response in relation to the Regulator's MAIB Pricing Policies Investigation Draft Report.

We do not agree that peer-to-peer car sharing vehicles should continue to be classified as Hire & Drive (Class 8) vehicles. Our recommendation is that they should be included within Class 1 or that a new class is created solely for peer-to-peer car sharing.

Our rationale is based on the following data.

Utilisation rates

The average utilisation rate of vehicles on the egee platform is less than 25%, meaning that vehicles are rented out on average seven days per month compared to the exclusive car rental industry which operates on utilisation rates above 65% or 19 days per month.

Claims history

All our vehicles are insured comprehensively for both personal use by the car owner and rental use by verified drivers. Any CTP claim is therefore unlikely to happen without us or our insurer being notified and, in most cases, would also result in a comprehensive insurance claim. None of the comprehensive insurance claims we've had to date have been linked to CTP claims. All our motor claims so far have been a result of vehicles moving at low speeds, mostly parking damage. We can therefore report that there hasn't been any CTP claims related to any of the vehicles on the egee platform during over 6,500 rental days

across Australia. It is also the case for the days those vehicles have been operated privately by the vehicle owners.

Demographics

All renters of our vehicles must be at least 25 years of age and on average are 39 years of age. Based on our in-depth customer research our renters are also of medium to high income, are interested in the latest technology and are concerned about social causes and environmental issues. The above factors are associated with lower insurance claims risk.

Process

Each renter, after completing the online verification process, meets with the vehicle owner for an induction, which takes 20-60 minutes to conduct. Unlike the traditional car rental process whereby the keys are simply handed over to the renter, this process renters familiarise themselves with the vehicle, get to know how it operated and explore all its features.

The fact that the renter meets the owner also contributes to them feeling a personal responsibility causing any damage to the car knowing that it belongs to an individual, rather than a large car rental fleet.

Each Tesla vehicle has a live tracking system that the renters are aware of. Combined with the personal responsibility to the owner, this results in lower overall likelihood of driver inattention or aggressive driving compared to traditional rental cars.

Vehicle types and their inherent safety

As most of the cars on our platform are deemed premium vehicles and the majority are less than 3 years old (due to the recent growth in the EV market), they are outfitted with the latest passive and active safety features and technologies. This also means the renters are more careful and respectful towards a new vehicle.

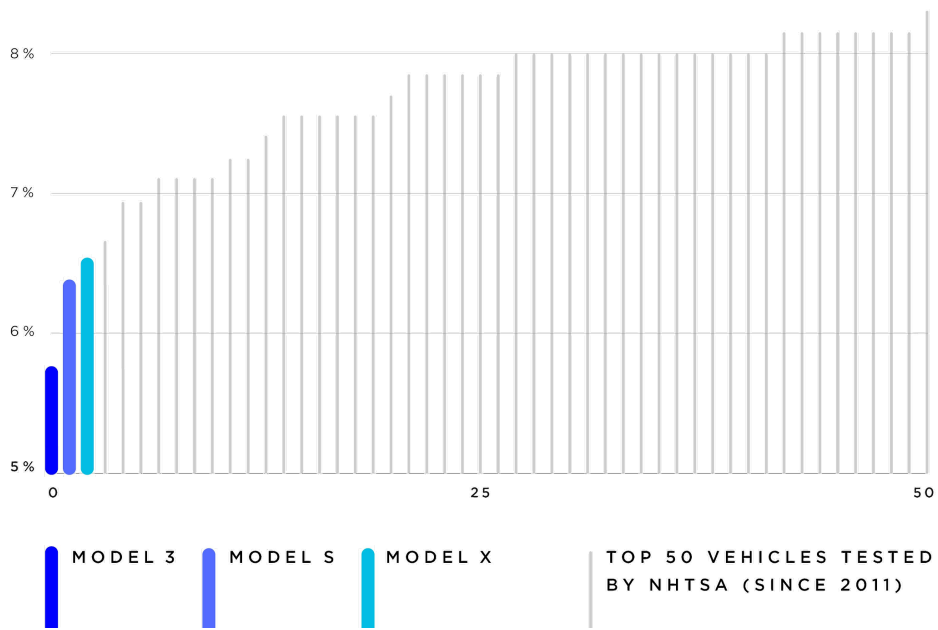
Tesla vehicles that comprise most of our fleet, and electric vehicles in general have inherent safety benefits, such as

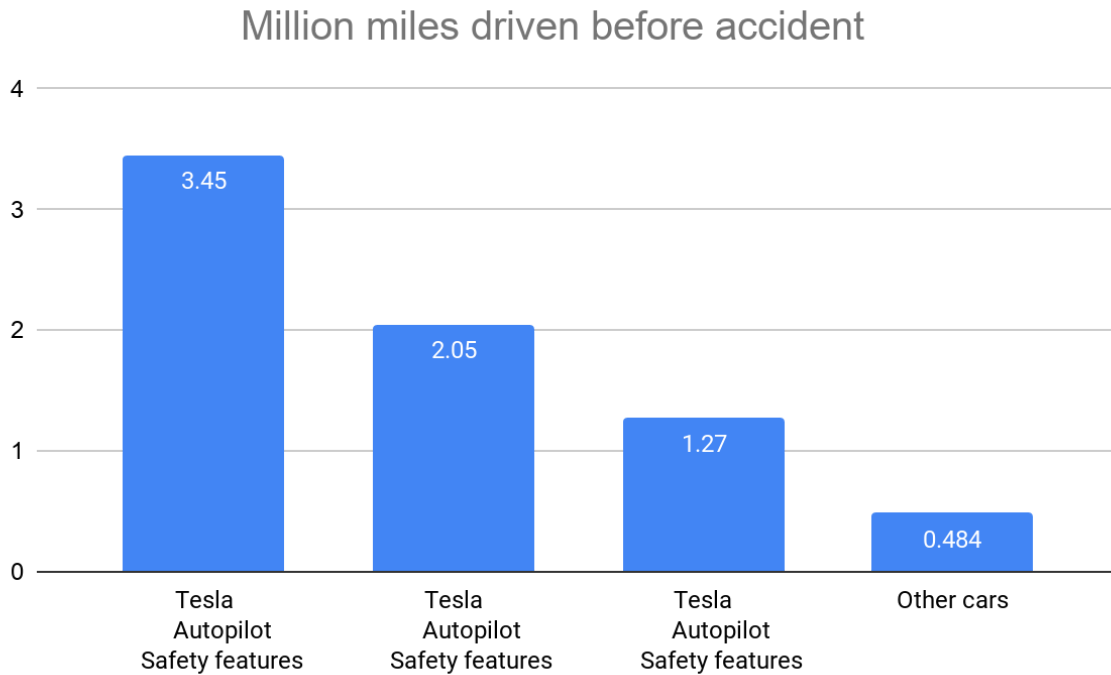
- Enhanced structural rigidity provided by the battery pack, which protects the vehicle occupants
- Large frontal crumple zone (instead of the combustion engine), which absorbs the impact energy and reduces the cabin deformation

- Low centre of gravity due to the battery pack (heaviest component) being located in the floor of the vehicle results in extremely low probability of rollover.

Below are 2 graphs representing the relative safety of Tesla vehicles. Full safety report can be viewed [here](#). Full report on active features can be viewed [here](#).

LOWEST PROBABILITY OF INJURY TESTED BY NHTSA





First mover issue

High MAIB class 8 premium prevents many private owners from joining one of the car sharing platforms in Tasmania because of the initial cost. This, in turn, prevents the car-sharing platforms from collecting sufficient data to then substantiate the lower CTP claims risk. It is important to note that such a high upfront cost only presents an issue in Tasmania, not any other state, and hence hinders the growth of the car-sharing industry in the state.

Summary

Based on the information above and our operational experience in other states, we propose that car-sharing platforms have a lower risk of MAIB claims than applicable to the class 8 and are more akin to “motor car” class 1 or “ride-sourcing” class 23.

Regards,

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