4

Electric Vehicles, PLI Schemes & *Future* Mobility

ELECTRIC MOBILITY

PLI SCHEMES

CHARGING INFRASTRUCTURE

AUTONOMOUS VEHICLES

SUSTAINABLE FUTURE

FAME II, PLI for ACC & Auto, Charging Infrastructure Law, AMP 2026 & Autonomous Vehicles

FAME II | PLI for ACC & Auto | Charging Infrastructure Law | AMP 2026 | Autonomous Vehicles

Electric Vehicles, PLI Schemes & Future Mobility Law

FAME II, PLI for ACC & Auto, Charging Infrastructure, AMP 2026 & Autonomous Vehicles

Booklet IV of VI

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TABLE OF CONTENTS

CHAPTER ONE

FAME Scheme: Legal Architecture and Commercial Framework

Phase I, Phase II, PM E-DRIVE, Eligibility, Localisation Enforcement, and GST on EVs

> *The FAME and PM E-DRIVE schemes are the Central Government's primary demand incentive instruments for electric vehicles. Their legal architecture — from eligibility criteria to localisation enforcement — shapes the commercial model for every EV OEM operating in India.*

1.1 FAME II Design and Incentive Structure

FAME Phase II (April 2019 to March 2024, total outlay Rs. 11,500 crore) concentrated demand incentives on electric two-wheelers, three-wheelers, and buses for public transport, while including electric passenger cars only under stringent eligibility criteria: maximum ex-factory price of Rs. 15 lakh, minimum 140 km electric range, minimum 21.9 kWh battery capacity. The incentive for two-wheelers was set at Rs. 15,000 per kWh of battery capacity (subject to a ceiling of 40% of ex-factory price), creating a financial model where the per-vehicle government subsidy could range from Rs. 10,000 to Rs. 70,000 depending on battery pack size. The scheme required manufacturers to reduce the retail price by the subsidy amount at the point of sale and claim reimbursement from the Ministry of Heavy Industries through the FAME portal, making the manufacturer the financial

intermediary between the government and the consumer and placing the cash flow management burden on the manufacturer during the period between sale and reimbursement — a working capital consideration that smaller EV startups found challenging in the early years of the scheme.

The localisation requirements introduced into FAME II from February 2021 were the scheme's most commercially disruptive regulatory development. The notification required eligible two-wheelers to achieve minimum 50% localisation (by component value) from April 2021, with the traction battery, electric motor, and motor controller specifically required to be locally manufactured. The rationale was to prevent the scheme from primarily subsidising Chinese-origin battery cells assembled in India with minimal value addition, thereby channelling government subsidy to overseas component manufacturers rather than building domestic manufacturing capability. For OEMs who had built their supply chains around imported Chinese battery packs or pack-level imports from CATL, BYD affiliates, or other Chinese sources, the localisation mandate required urgent supply chain restructuring — either developing or qualifying domestic battery pack assemblers who could achieve localisation compliance, or restructuring import arrangements to import cells separately and assemble packs in India with sufficient domestic value addition to meet the threshold.

The FAME II compliance audits of 2022-23 — which found several leading electric two-wheeler manufacturers to have received incentives in excess of their localisation-compliant entitlement — demonstrated that the government's monitoring infrastructure had real enforcement capability. The recovery notices issued to manufacturers (for amounts ranging from tens to hundreds of crores in specific reported cases) created significant reputational and financial impacts, and the media coverage of the enforcement actions served as a broader industry warning that FAME claims required rigorous localisation documentation rather than optimistic assertions. OEM counsel advising clients on FAME compliance should: review the localisation determination methodology used in each claim period; verify that the component-level sourcing declarations supporting localisation claims are consistent with the actual production records and supply chain documentation; and ensure that any ambiguities about the localisation calculation methodology have been resolved through written clarification with the Ministry before claims are submitted.

1.2 PM E-DRIVE: Architecture and OEM Strategy

PM E-DRIVE (September 2024, outlay Rs. 10,900 crore over two years) succeeded FAME II with a refocused emphasis on electric buses (Rs. 4,391 crore), electric trucks (a new category at Rs. 500 crore), electric ambulances (Rs. 500 crore), and electric two-wheelers and three-wheelers (Rs. 3,679 crore). The conspicuous exclusion of four-wheeled passenger EVs from PM E-DRIVE demand incentives reflects the government's assessment — supported by strong sales growth data — that the passenger EV segment has achieved sufficient commercial momentum to develop without Central demand subsidies, aided by GST concessions (5% versus 28%+ for ICE vehicles), state-level incentives, and the progressive improvement in total cost of ownership as battery costs decline. For electric two-wheeler OEMs, PM E-DRIVE's declining incentive structure (Rs. 5,000 per kWh in year one, Rs. 2,500 per kWh in year two, with per-vehicle caps of Rs. 10,000 and Rs. 5,000 respectively) signals the government's expectation of commercial parity within the scheme period, requiring OEMs to manage the cost trajectory of their products to remain competitive after incentives expire.

1.3 GST on Electric Vehicles: The Transformative Rate

The GST Council's decision in July 2019 to reduce GST on electric vehicles from 12% to 5% (with no Compensation Cess) is arguably the single most commercially significant regulatory change in India's EV history, creating a 23 to 45 percentage point GST differential between EVs and comparable conventional vehicles that dwarfs the per-vehicle FAME/PM E-DRIVE demand subsidies in aggregate financial impact across the fleet. For a premium electric SUV selling at Rs. 80 lakh ex-showroom, the 5% GST (Rs. 3.81 lakh at 5%) compared to the 50% combined GST and cess applicable to a comparable premium petrol SUV (approximately Rs. 32 lakh) represents a GST saving of approximately Rs. 28 lakh — a differential that fundamentally changes the comparative economics of the electric and petrol alternatives and makes premium EVs price-competitive with comparable ICE vehicles at a much lower manufacturing cost premium than would otherwise be required. OEM pricing strategy for EVs in India is significantly shaped by the 5% GST rate: the OEM can set the EV's ex-showroom price at a level that reflects the manufacturing cost premium over ICE (which may be 20-40% for comparable models due to battery cost) while still delivering an on-road price advantage to the consumer, because the GST and cess saving more than offsets the manufacturing cost differential at current battery prices.

1.4 State EV Policy Landscape

India's state EV policies create a patchwork of supplementary demand incentives that vary significantly in generosity, scope, and implementation effectiveness. Delhi's EV Policy 2020 stands out as the most financially generous state programme for passenger EVs: complete road tax exemption (saving Rs. 1.5–3 lakh on mid-range EVs), complete registration fee exemption (saving Rs. 50,000–2 lakh), purchase incentives of up to Rs. 1.5 lakh for four-wheelers, and scrapping incentives when replacing older vehicles. Maharashtra provides capital subsidies for EV manufacturing investment and fleet electrification support for MSRTC and BEST, while Gujarat offers GUVNL-facilitated renewable energy arrangements for battery manufacturing facilities and investment support for EV park development. Karnataka, Rajasthan, and Andhra Pradesh each have EV policies providing combinations of purchase incentives, registration exemptions, and manufacturing investment support that create state-specific market dynamics requiring OEMs to model their pricing and product introduction strategies on a state-by-state basis.

CHAPTER TWO

PLI for Automobile and Auto Components: Deep Legal Analysis

Rs. 25,938 Crore Scheme, AAT Products, Investment Obligations, Claims Mechanism and Dispute Framework

2.1 PLI Auto: Scheme Architecture

The Production Linked Incentive (PLI) scheme for Automobile and Auto Components, notified by the Ministry of Heavy Industries in September 2021 with a total outlay of Rs. 25,938 crore over five years (FY2022-23 to FY2026-27), is structured as an annual cash incentive paid on the incremental sales of Advanced Automotive Technology (AAT) products above a base year benchmark. Two categories of beneficiaries are eligible: "Champion OEMs" — automobile manufacturers committing minimum Rs. 3,000 crore in new AAT manufacturing investment — and "Component Champions" — auto component manufacturers committing minimum Rs. 500 crore. The incentive rates range from 13–18% of incremental sales for battery electric vehicles (BEVs) and hydrogen fuel cell vehicles (FCEVs) — the highest-priority categories — to 13% for PHEVs, 8–13% for dedicated EV components, and 3–5% for advanced ICE and hybrid vehicles. This differentiated incentive structure creates a strong commercial signal: the government is willing to pay significantly more per rupee of incremental sales for products that align with its long-term decarbonisation strategy (pure EVs and hydrogen vehicles) than for products that are merely evolutionary improvements on the existing ICE technology base.

The approval letter issued to each PLI beneficiary following selection creates the foundational legal relationship governing the scheme participation: it specifies the minimum committed investment, the eligible product categories and applicable incentive rates, the base year sales from which incremental sales are measured, the incentive ceiling (the maximum total incentive payable over the five-year period, which limits the government's fiscal exposure regardless of the beneficiary's actual sales growth), and the conditions of participation including audit rights, reporting requirements, and the consequences of non-compliance. OEM counsel reviewing PLI approval letters must ensure that: the AAT product definitions are precise enough to cover the OEM's actual and planned product portfolio; the investment commitment level is achievable given the OEM's capital allocation plans and supply chain development timelines; the base year sales are correctly computed from audited financial data; and the conditions of participation are operationally manageable given the OEM's governance and reporting infrastructure. Any ambiguity in the approval letter terms should be resolved through written correspondence with the Ministry before capital expenditure is committed under the scheme.

2.2 Investment Verification and Compliance

The PLI scheme's investment verification mechanism — administered by the Project Management Agency (PMA) appointed by the Ministry — requires beneficiaries to demonstrate that the committed minimum investment has been made in "AAT product manufacturing capacity" within the specified investment period. "Investment" for PLI purposes means capital expenditure on fixed assets (plant, machinery, equipment, buildings, and infrastructure) specifically dedicated to the manufacture of PLI-eligible AAT products, excluding working capital, intangible assets, and investments in non-AAT product manufacturing. Shared or multi-purpose assets — used for both PLI-eligible and non-PLI-eligible manufacturing — must be allocated to PLI on a

documented basis (typically by production hours or floor area), and the allocated portion must be supported by credible allocation methodology documentation. The most common investment eligibility disputes in PLI Auto proceedings involve: the treatment of investments in shared facilities (where the allocation basis is contested by the PMA); the eligibility of building and civil work investments (where the PMA scrutinises whether the construction is genuinely manufacturing infrastructure or merely administrative accommodation); and the treatment of investments in leased equipment (where some beneficiaries have argued that leased-in manufacturing assets constitute "investment" for PLI purposes, a position that the Ministry has generally not accepted). Getting clarity on investment eligibility before committing to specific investment structures is essential — the cost of restructuring investments post-commitment to ensure PLI eligibility is invariably higher than proactive upfront clarification.

2.3 Sales Incentive Claims: Annual Computation

The PLI incentive for each financial year of the incentive period is computed as the excess of eligible AAT product sales in that year over the base year sales, multiplied by the applicable incentive rate for each product category. The annual claim submission requires: a detailed product-category-wise sales statement drawn from audited financial statements; GST reconciliation confirming consistency between the claimed sales and the OEM's GSTR-1 and GSTR-3B returns; an independent chartered accountant's certification of the claim; and submission through the PLI portal by 30 September following the end of the relevant financial year. The PMA's verification process — which typically involves data cross-referencing against GSTN returns, VAHAN registration data, and available production records — may identify discrepancies between the claimed sales and the verified data, leading to either claim reduction (where sales are found to have been over-counted) or queries requiring additional explanation or documentation before the claim is finalised. Maintaining meticulous product variant-level sales records, consistent GST invoice classification for AAT products, and a clear audit trail from production records to sales invoices to GST returns is the foundation of a defensible PLI claim.

CHAPTER THREE

PLI for Advanced Chemistry Cell Battery Manufacturing

Rs. 18,100 Crore Scheme, Gigafactory Economics, Localisation Milestones, BIS Certification and Battery Safety

3.1 ACC PLI: Strategic Architecture

The PLI scheme for Advanced Chemistry Cell (ACC) battery manufacturing, notified in May 2021 with a total outlay of Rs. 18,100 crore over five years, targets the creation of 50 GWh of domestic lithium-ion cell manufacturing capacity to address India's strategic vulnerability in the EV value chain — the near-total dependence on imported cells, predominantly from Chinese manufacturers. Four bidders were selected through a competitive process: Rajesh Exports (5 GWh), Reliance New Energy Solar (5 GWh), Ola Electric Technologies (20 GWh), and Hyundai Global Motors through its Indian entity (20 GWh). Each selected bidder executed an Implementation Agreement with the government specifying the investment timeline, capacity milestones, localisation targets, and incentive structure. The incentive rates under ACC PLI range from Rs. 2,000 per kWh (for cells achieving 25% localisation in the first production year) to Rs. 3,500 per kWh (for cells achieving 60%+ localisation), incentivising progressive development of the domestic battery cell component supply chain alongside manufacturing capacity scale-up.

The economics of gigascale battery cell manufacturing — requiring Rs. 3,000–6,000 crore per GWh of capacity for a fully integrated facility — create one of the most capital-intensive manufacturing investment decisions in any industry. The capital cost includes: electrode manufacturing equipment (mixing, coating, calendering, and slitting lines operating in controlled humidity environments); cell assembly equipment (stacking or winding lines in ultra-dry rooms); formation and aging equipment (charge-discharge cycling equipment for newly assembled cells, the most energy-intensive and space-demanding part of the process); quality testing and grading equipment; and the factory infrastructure (buildings, utilities, compressed gas systems, and fire suppression systems for large battery storage areas). Beyond the capital cost, the operational challenges are equally demanding: managing the complex chemistry of lithium-ion cell production (where minor process variations can cause cell failures detectable only through long-term cycle testing); developing a workforce with the specialised skills required for high-precision electrochemical manufacturing; and qualifying cell products with OEM customers (a process that typically requires 6–18 months of characterisation, testing, and vehicle integration validation before commercial supply begins).

3.2 Battery Safety Regulation: AIS-156 and BIS Certification

Battery safety in India is governed by two parallel regulatory frameworks: the MoRTH/CMVR-TSC standards (AIS-038 and AIS-156) for the type approval of traction battery systems as vehicle components; and the BIS (Bureau of Indian Standards) certification requirements for the lithium-ion cells that comprise the battery system. AIS-156, significantly amended in 2022 following EV battery fires, mandates a thermal propagation test that no fire or explosion should occur outside the battery pack for at least five minutes after thermal runaway is triggered in a single cell — a requirement that has forced fundamental design changes in battery pack thermal management and cell arrangement. The BIS certification requirement for lithium-ion cells (under IS 16046, the Indian standard for lithium-ion battery safety) requires that each cell model used in India-market EVs be certified by a BIS-recognised testing laboratory and that the cell manufacturer's facility undergo BIS factory inspection and surveillance audits. For OEMs who source cells from overseas suppliers, the BIS certification obligation requires coordination with suppliers to ensure

valid certificates are maintained for each cell model, with the risk that BIS certificate lapses — due to missed factory inspections or audit failures at the supplier's facility — can disrupt the OEM's vehicle production and sales if uncertified cells are found in in-production vehicles.

CHAPTER FOUR

EV Charging Infrastructure: Legal Framework in Depth

Ministry of Power Guidelines, SERC Tariff Regulation, Bharat Standards, CPO Business Model and Battery Swapping

4.1 The Open Charging Market: Legal Foundation

The Ministry of Power's critical regulatory clarification — that operating a public EV charging station is a "consumer activity" rather than a "distribution of electricity" — is the foundational legal enabler of India's private charging infrastructure investment market. Under Section 12 of the Electricity Act, 2003, distributing electricity requires a licence; if charging station operators were classified as distributors, they would need a distribution licence (a major regulatory commitment requiring significant capital and ongoing compliance obligations) before operating a single charger. The MoP circular's "consumer" classification eliminates this barrier entirely: any company or individual can install charging equipment, purchase electricity from the distribution licensee at the applicable commercial tariff, and resell the charging service to EV drivers at a commercial rate without any electricity distribution licence. The commercial implications of this open market structure are profound — it enables CPOs (Charging Point Operators) ranging from oil marketing companies (IOCL, BPCL, HPCL who have converted petrol station forecourts into charging hubs) to dedicated EV charging startups (Charge Zone, ZEON, Bolt.Earth, Statiq) to property developers (who install charging as a real estate amenity) to automobile OEMs (who install charging networks as a customer service differentiator) to participate in the charging market without regulatory licencing barriers.

The Bharat connector standards — Bharat AC-001 for AC charging (based on IEC 62196-2 Type 2, the same connector used across Europe) and Bharat DC-001 for DC fast charging (incorporating CHAdeMO, CCS2, and GB/T connector types) — are mandatory for all public charging stations installed in India from the specified effective date. The mandatory connector standards directly affect OEM vehicle design choices: vehicles sold in India must incorporate charging ports compatible with the Bharat standards on both the AC (typically Bharat AC-001 / Type 2, built into the vehicle as the Mode 3 AC charging interface) and DC fast charging (typically CCS2 connector, which is compatible with the Bharat DC-001 standard) sides. For OEMs importing vehicles designed for the North American market (which uses the SAE J1772 Type 1 connector for AC charging and CCS1 for DC fast charging) or the Chinese market (which uses GB/T connectors), vehicle homologation for India must address the connector compatibility issue — either specifying India-market vehicles with the Bharat-compliant connector, or providing a certified adaptor that enables use of the Bharat-standard public infrastructure with the vehicle's market-specific charging port.

4.2 SERC EV Tariff Regulation

The electricity tariff for EV charging stations — the major operating cost for any CPO — is regulated by the State Electricity Regulatory Commissions, which have generally been receptive to the Ministry of Power's guidance to create favourable EV charging tariff categories. Delhi's DERC has specified a dedicated EV charging tariff with energy charges well below the commercial category rate, with time-of-use pricing that provides lower rates during off-peak hours (typically 11 PM to 6 AM) to encourage overnight charging by residential EV owners and to shift commercial charging demand away from the evening peak. Maharashtra's MERC provides a concessional EV charging tariff for both commercial public charging stations and residential home charging, with the residential rate at the domestic tariff level rather than the higher commercial rate. The impact of state EV

tariff variations on CPO economics is substantial: a CPO operating in a high-electricity-cost state (where the EV charging tariff is close to the general commercial rate) faces significantly worse unit economics than a CPO in a concessional-tariff state, affecting the charging price that must be charged to EV drivers to achieve breakeven and consequently the competitiveness of EV charging versus home charging or OEM-provided charging services.

CHAPTER FIVE

Automotive Mission Plan 2026 and National EV Policy

AMP 2026 Targets, NEMMP Framework, NITI Aayog Role, and State-Level EV Ecosystem Development

5.1 AMP 2026: Policy Framework and Commercial Implications

The Automotive Mission Plan 2026, jointly developed by the Ministry of Heavy Industries and SIAM, provides India's strategic roadmap for the automobile sector through 2026, setting ambitious targets for production volume, employment, export share, and technological transition. The Plan targets total vehicle production of 50 million units annually by 2026, automobile sector GDP contribution growing from 7.1% to 12%, employment in the sector increasing to 6.5 million, and India's global export share reaching 7% of world vehicle output. These macro-level production and economic targets provide the commercial context within which regulatory policy choices — on safety standards, emission norms, EV incentives, and manufacturing investment support — are calibrated: regulatory instruments that support the commercial objectives of AMP 2026 attract government support, while those perceived as obstacles to achieving the plan's targets face political resistance. The electrification transition is embedded in AMP 2026 as a cross-cutting theme, with the plan acknowledging both the commercial imperative of transitioning to EVs (driven by global market trends, climate commitments, and the cost trajectory of battery technology) and the policy challenge of managing the transition in a way that preserves domestic manufacturing employment and industrial capability.

The National Electric Mobility Mission Plan (NEMMP) 2020, launched in January 2013, established the original policy and institutional framework for India's EV transition, creating the FAME scheme vehicle and the inter-ministerial coordination mechanisms that have shaped every subsequent EV policy development. While the NEMMP's 6-7 million EV target for 2020 was not achieved (actual EV volumes remained a fraction of this due to the slower-than-anticipated battery cost decline and the limited charging infrastructure in the NEMMP's early years), the Plan's conceptual framework — identifying the barrier of high upfront cost (addressed through demand incentives), range anxiety (addressed through charging infrastructure), and lack of domestic manufacturing (addressed through supply-side PLI support) — has remained the analytical foundation for India's EV policy architecture through the FAME scheme and its successors. For OEMs engaging with government policy consultations on EV matters, the NEMMP/AMP 2026 framework provides the reference framework against which to assess the coherence and completeness of proposed regulatory interventions.

5.2 NITI Aayog's EV Policy Contributions

NITI Aayog has been an active and influential policy actor in India's EV transition, publishing research reports, policy recommendations, and discussion papers that have shaped regulatory development across the entire EV ecosystem. Key NITI Aayog contributions include the "Transformative Mobility" report (2018) recommending aggressive EV fleet targets that influenced FAME II's structure; the "India's Electric Mobility Transformation" report (2021) providing roadmaps for EV deployment across different vehicle segments; the Battery Swapping Policy (2022 discussion paper) proposing interoperability standards for swappable battery systems; and the "Harnessing Green Hydrogen" opportunities report (2022) that informed the National Green Hydrogen Mission. NITI Aayog's policy recommendations do not have statutory force but carry significant influence over ministerial decisions given the institution's constitutional mandate as the government's principal policy advisory

body. For industry stakeholders seeking to influence EV policy, engagement with NITI Aayog consultations (which are typically open and transparent) is an effective channel for presenting evidence-based input that can shape formal regulatory proposals before they reach the ministry stage.

CHAPTER SIX

Autonomous and Connected Vehicles: India's Emerging Legal Framework

AV Regulatory Sandbox, CMVR ADAS Mandates, DPDPA Data Governance, and the Path to Permitted Autonomous Operation

6.1 Current ADAS Regulatory Framework

The progressive introduction of Advanced Driver Assistance Systems (ADAS) in India's vehicle safety regulatory framework has followed a staged approach, starting with the most proven safety technologies that provide clear, measurable crash reduction benefits and progressively moving towards higher levels of automation as the technology matures and the regulatory framework develops. The ADAS requirements currently mandated or on the regulatory roadmap include: Anti-lock Braking System (ABS, mandatory for all new M1 vehicles from April 2019 under AIS-012); Electronic Stability Control (ESC, mandatory for all new M1 vehicles from April 2023 under AIS-145); Speed Alert System (SAS, mandatory since 2017 under AIS-137, audibly warning the driver at 80 km/h and 120 km/h); reversing warning systems (cameras or sensors to assist in low-speed reversing for certain vehicle categories); and seatbelt reminder systems. The forthcoming Autonomous Emergency Braking (AEB) mandate — expected to be notified by MoRTH for new M1 vehicles aligned with UN ECE Regulation R152 — will represent the most significant ADAS mandate in India's regulatory history, requiring vehicles to automatically apply brakes to avoid or mitigate frontal collisions with pedestrians, cyclists, and other vehicles detected by the vehicle's onboard sensors.

For premium OEMs whose global vehicle platforms include sophisticated AEB, Lane Departure Warning, and Blind Spot Detection systems as standard equipment, the India ADAS mandate trajectory creates a commercial alignment: the regulatory requirements are progressively catching up with the technology levels already standard on premium vehicles, enabling OEMs to position their standard ADAS features as regulatory future-proofing that protects against the cost and delay of post-mandate retrofitting for buyers who intend to keep their vehicles beyond the mandate implementation date. For volume OEMs whose Indian-market vehicles have been offered with reduced ADAS specifications compared to their global variants (due to cost pressures in the highly price-sensitive Indian market), the ADAS mandate trajectory creates a product specification upgrade imperative that must be factored into their model lifecycle planning and price positioning strategy.

6.2 Data Privacy for Connected Vehicles: DPDPA Framework

The Digital Personal Data Protection Act, 2023 (DPDPA) establishes India's comprehensive framework for personal data governance, directly applicable to the vast volumes of data generated by modern connected vehicles. For automobile OEMs, the DPDPA's requirements apply to: vehicle telematics data (GPS location, speed, route history — linked to the registered vehicle owner); driver behaviour data (harsh braking, acceleration events, driving hours — recorded for warranty and safety purposes); infotainment and navigation data (search histories, frequent destinations, personal preferences stored in the vehicle system); and connectivity service data (remote diagnostics, OTA updates, emergency call records). The DPDPA requires "Data Fiduciaries" (entities that collect and process personal data) to obtain free, specific, informed, unconditional, and unambiguous consent from the "Data Principal" (the individual whose data is processed) for each distinct purpose of data processing, implement appropriate technical and organisational security measures, and provide Data Principals with rights to access, correction, erasure, and grievance

redressal regarding their personal data.

Implementing DPDPA compliance for a fleet of hundreds of thousands of connected vehicles requires OEMs to: develop a comprehensive data inventory mapping all data types collected, the purposes for which they are processed, the retention periods, and the third parties with whom they are shared; redesign connected service agreements and vehicle owner onboarding processes to include DPDPA-compliant consent mechanisms that clearly describe each data processing purpose; implement technical controls for data access, correction, and deletion requests; establish a Data Protection Officer function as required for significant data processors; and develop incident response capabilities for personal data breaches that comply with the DPDPA's breach notification requirements. The complexity of DPDPA compliance for OEMs is amplified by the diversity of connected service use cases (telematics, infotainment, remote diagnostics, OTA updates, fleet management, insurance telematics), each of which involves different data types, processing purposes, and third-party data sharing arrangements that must be individually assessed and documented under the consent framework.

Booklet IV — Comprehensive Summary: India's EV and future mobility legal framework spans demand incentives (FAME II, PM E-DRIVE, GST at 5%, state policies), manufacturing support (PLI Auto at Rs. 25,938 crore, PLI ACC at Rs. 18,100 crore), infrastructure regulation (MoP charging guidelines, SERC tariff regulation, Bharat connector standards), and technology governance (CMVR ADAS mandates, AV regulatory sandbox, DPDPA data privacy). The commercial complexity of navigating this multi-dimensional framework — simultaneously optimising PLI incentive claims, managing FAME localisation compliance, structuring charging infrastructure commercial arrangements, and preparing for ADAS and data privacy mandates — requires integrated legal expertise across incentive scheme law, industrial policy, electricity regulation, data protection, and automotive regulation. Practitioners who can provide this integrated expertise will be among the most valued advisors to the OEMs, battery manufacturers, charging operators, and technology companies building India's electric vehicle future.