

**\*\*Title:\*\*** Bautista v. Juinio: A Test of Government-Imposed Vehicle Restrictions for Energy Conservation

**\*\*Facts:\*\***

The case originated from the issuance of Letter of Instruction No. 869 dated May 31, 1979, by the Philippine government as a response to the ongoing oil crisis that began in 1974. This Letter sought to conserve energy by prohibiting the use of private motor vehicles with H (Heavy) and EH (Extra Heavy) plates on weekends and holidays, specifically from Saturday 12:00 a.m. (though the petition mentioned 1:00 a.m.) to Monday 5:00 a.m., or from 1:00 a.m. of a holiday to 5:00 a.m. the day after the holiday. Exemptions were provided for certain vehicle classifications like Service (S), Truck (T), Diplomatic (DPL), Consular Corps (CC), and Tourist Cars (TC).

Following this, Memorandum Circular No. 39 was issued on June 11, 1979, imposing penalties of fines, vehicle impounding, and cancellation of registration for violations of the Letter of Instruction. Petitioners Mary Concepcion Bautista and Enrique D. Bautista, owners of vehicles affected by the ban, challenged the Letter and Memorandum's constitutionality on grounds of due process, equal protection, and unlawful delegation of legislative power. Their petition led to a Supreme Court hearing after lower court actions and procedural moves that set the stage for a high-profile constitutional debate.

**\*\*Issues:\*\***

The Supreme Court was tasked to examine:

1. Whether the vehicle restriction and the subsequent penalties violate the guarantee of due process.
2. If the classification of vehicles under the ban violates the equal protection clause.
3. Whether the issuance of Memorandum Circular No. 39 involves an undue delegation of legislative power.

**\*\*Court's Decision:\*\***

The Supreme Court dismissed the petition, upholding the constitutionality of both the Letter of Instruction No. 869 and Memorandum Circular No. 39. The Court reasoned as follows for each issue:

1. **\*\*Due Process:\*\*** The Court found the governmental actions reasonable and within the ambit of the police power to promote public welfare, particularly in addressing the urgent problem of energy conservation.
2. **\*\*Equal Protection:\*\*** The classification of vehicles was seen as having a rational basis,

relating directly to the objective of reducing fuel consumption during critical periods. Thus, it did not constitute arbitrary discrimination.

3. **Legislative Delegation:** The Court ruled that the Letter of Instruction, viewed as part of the President's executive power to issue decrees during martial law, did not involve an improper delegation of legislative authority. Moreover, Memorandum Circular No. 39 had legal grounding in the Land Transportation and Traffic Code, although the Court noted that vehicle impounding lacked statutory support.

**Doctrine:**

This case solidifies the doctrine that regulatory measures addressing public welfare concerns, such as energy conservation, are upheld if they have a rational basis and do not infringe on fundamental constitutional rights. It also reaffirms the broad scope of police power, which includes regulatory discretion within constitutionally permissible limits.

**Class Notes:**

1. **Due Process in Regulatory Measures:** Measures that affect property or liberty interests must be reasonable, non-arbitrary, and implemented in pursuit of the common good.
2. **Equal Protection and Classification:** Governmental classification must have a rational basis, especially in regulatory schemes addressing public concerns.
3. **Delegation of Legislative Power:** Executive and administrative issuance of regulatory measures is permissible if it does not exceed the bounds of authority granted by law and is in pursuit of enforcing existing statutes.

**Historical Background:**

The case is set against the backdrop of the 1970s oil crisis, highlighting the Philippine government's efforts to mitigate fuel shortages and manage the economic impact. It represents a significant legal examination of energy conservation measures within the broader context of the state's police power and constitutional guarantees.