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Cruise LLC  
333 Brannan St.  
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February 26, 2021

California Public Utilities Commission  
Consumer Protection & Enforcement Division, License Section  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: AV Passenger Service Pilot Program Exemption Request

Dear Consumer Protection & Enforcement Division,

Cruise<sup>1</sup> is working to bring an all-electric, self-driving car service to Californians with the aim of making our roads safer and reducing GHG emissions.

Cruise submits this request pursuant to General Order (G.O.) 157-E, Part 8.02 for limited exemption from Charter-Party Carrier (TCP) regulations for participants in the California Public Utilities Commission's (Commission) Driverless Test Autonomous Vehicles Passenger Service Pilot Program (AV Pilot). We submit this request with Cruise's AV Pilot application. The exemption described below would support the purpose of the AV Pilot and remain functionally equivalent to the obligations of G.O. 157-E.

Cruise seeks a technical exemption in conformance with its corporate structure, which would mirror an exemption the Commission approved in connection with Cruise's participation in the Commission's Driverless Test Autonomous Vehicles Passenger Service Pilot Program.<sup>2</sup>

1) Equipment Listing. Cruise seeks an exemption under G.O. 157-E Part 8.02 from the requirement in G.O. 157-E 4.01 that TCP holders maintain an equipment list of vehicles owned or leased for use under the permit.<sup>3</sup> Cruise seeks to list on its equipment list vehicles owned by General Motors Company LLC ("GM"), which has a controlling interest

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<sup>1</sup> Cruise LLC.

<sup>2</sup>

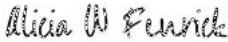
[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Licensing/autovehicle/Cruise\\_ExemptionRequest.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Licensing/autovehicle/Cruise_ExemptionRequest.pdf)

<sup>3</sup> See also D.18-05-043 at 15; AV Pilot application packet Form PL-664-AV.

in Cruise.<sup>4</sup> Cruise will satisfy all other vehicle requirements under G.O. 157-E and Decision (D.) 18-05-043. Cruise will manage the AV Pilot, and has authority to manage or direct the use of any equipment made a part of the pilot. Should the Commission grant this exemption, Cruise's AV Pilot operations will be functionally equivalent under G.O. 157-E and D.18-05-043.

Cruise respectfully requests that CPED grant this G.O. 157-E Part 8.02 exemption request.

Sincerely,

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Alicia Fenrick

Associate General Counsel

Enclosure: Declaration of A. Fenrick

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<sup>4</sup> Title to AVs for the AV Pilot will be held by GM or its subsidiaries. Cruise is a wholly-owned subsidiary of GM Cruise Holdings LLC ("Cruise Holdings"). Through its wholly-owned subsidiary, General Motors Holdings LLC, GM has a controlling interest in Cruise Holdings and subsequently Cruise.