

# ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

## ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660

FAX: (650) 589-5062

rkoss@adamsbroadwell.com

## SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350  
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201

FAX: (916) 444-6209

KEVIN T. CARMICHAEL  
CHRISTINA M. CARO  
JAVIER J. CASTRO  
THOMAS A. ENSLOW  
KELILAH D. FEDERMAN  
ANDREW J. GRAF  
TANYA A. GULESSERIAN  
KENDRA D. HARTMANN\*  
DARIEN K. KEY  
RACHAEL E. KOSS  
AIDAN P. MARSHALL  
TARA C. RENGIFO

### *Of Counsel*

MARC D. JOSEPH  
DANIEL L. CARDOZO

\*Not admitted in California.  
Licensed in Colorado.

November 24, 2021

### **Via Electronic Mail Only**

Douglas Ito  
California Public Utilities Commission  
Consumer Protection and Enforcement Division  
505 Van Ness Avenue  
San Francisco, CA 94102-3214  
Email: [douglas.ito@cpuc.ca.gov](mailto:douglas.ito@cpuc.ca.gov)

Re: **Response to Advice Letter 0001 – Cruise Application for  
Driverless Deployment Permit (Cruise LLC PSG 00390807)**

Dear Mr. Ito:

The Coalition of California Utility Employees (CUE) respectfully submits this response in support of Cruise's November 5, 2021 Application for Driverless Deployment Permit (AL-0001). CUE is a coalition of unions whose members work at nearly all of the electric utilities in California, both investor owned and publicly owned. Cruise's proposed expansion will help California reach its climate goals and will create jobs and revenue for our state.

Electrifying transportation in California will significantly improve air quality, decrease greenhouse gas emissions, put downward pressure on electric rates and create jobs. Electric vehicle manufacturing has already created 275,000 jobs in the state,<sup>1</sup> and decarbonization could create significantly more over the next 15 years.<sup>2</sup> Given the significant benefits of transportation electrification, we

---

<sup>1</sup> <https://insideevs.com/news/402942/laedc-california-ev-industry-booming/>

<sup>2</sup> <https://www.fastcompany.com/90533448/how-to-create-25-million-jobs-by-decarbonizing-the-economy>

1011-1822acp

November 24, 2021  
Page 2

supported Cruise's efforts to enact SB 500,<sup>3</sup> a law that requires all new, light-duty driverless vehicles in California to be zero-emission by 2030.

Moreover, expanding Cruise's driverless electric vehicle commercial operation throughout the state will create additional jobs to build the needed infrastructure to power those vehicles. All of Cruise's electric vehicles in California are powered 100% by renewable energy.

Finally, with the recently signed infrastructure bill<sup>4</sup> designed to invest heavily in clean energy and transportation resources, now is the ideal time to continue California's push to reshape its transportation network. The jobs created to power and maintain Cruise's vehicles can attract new workers to the state and set California up as an example for the rest of the country of how transportation electrification can boost economies.

We urge the Commission to approve Cruise's Application for Driverless Deployment Permit so that California can experience the economic and environmental benefits of a commercial network of driverless electric vehicles.

This response was sent by email to the following on November 24, 2021:

Cruise LLC  
Prashanthi Raman [prashanthi.raman@getcruise.com](mailto:prashanthi.raman@getcruise.com)  
Aichi Daniel [aichi.daniel@getcruise.com](mailto:aichi.daniel@getcruise.com)

Sincerely,



Rachael E. Koss

REK:acp

cc: [avprograms@cpuc.ca.gov](mailto:avprograms@cpuc.ca.gov)  
Service lists for R.12-12-011 and R.19-02-012

---

<sup>3</sup> [https://www.renewableenergymagazine.com/electric\\_hybrid\\_vehicles/leading-organisations-call-on-california-legislators-to-20210621](https://www.renewableenergymagazine.com/electric_hybrid_vehicles/leading-organisations-call-on-california-legislators-to-20210621)

<sup>4</sup> <https://www.nytimes.com/2021/08/10/us/politics/infrastructure-bill-passes.html>