



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

Monday, November 29, 2021

Douglas Ito, Director
Consumer Protection and Enforcement Division
California Public Utilities Commission
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Submitted via Email: douglas.ito@cpuc.ca.gov, AVPrograms@cpuc.ca.gov

RE: EVCA RESPONSE IN SUPPORT OF CRUISE ADVICE LETTER 0001

Director Ito:

Pursuant to General Order (GO) 96-B Rule 7.4, I hereby submit a response in support of Cruise's Cruise Application for Driverless Deployment Permit - Tier 3 Advice Letter - 0001 submitted on November 5, 2021.

I am pleased to support Cruise's Advice Letter (AL) 0001 seeking CPUC Driverless Deployment Permit. In reviewing Cruise's application, their plan provides a sound Passenger Safety Plan and robust information about testing. With California's continuing focus on EVs to reach our climate goals, we need Cruise vehicles on the road as soon as possible.

As one of the leading trade associations in the United States focused on EV infrastructure and adoption, the Electric Vehicle Charging Association (EVCA) has always supported new technologies and innovations that can reduce California's transportation emissions and advance our broader climate goals.

Electric AV technology, like that provided by Cruise, has huge potential to assist in future emergencies like wildfires, power shutoffs, and emerging threats from climate change. Contactless transportation of people is of more interest now than ever. Developing a robust infrastructure that can serve as part of relief efforts in future pandemics, or later stages of this one, and to natural disasters imposed by climate change is key. Looking ahead, Cruise's purpose-built vehicle, the Cruise Origin, could potentially be used as a mobile battery pack, supporting communities and first responders during extended power outages.

Furthermore, Cruise's shared EV ridehailing service can expand the public's ability to more seamlessly travel by zero emission miles. While we have made strong progress in terms of EV adoption in California, much work is still needed. Innovations like Cruise's autonomous electric ridehailing platform - powered by renewable energy - can serve as an invaluable complement to decarbonize urban transportation while averting the challenges of EV adoption. Expedient deployment of this technology is needed to achieve our ambitious goals for transportation emissions reduction.

Delayed deployment could also lead to "carmageddon" and worsening air quality & environmental impact. We're already seeing reports that the pandemic could unleash "carmageddon" in SF and other cities as people opt for singular rides and feel it is unsafe to travel by public transit or in shared spaces. A centrally managed EV AV fleet could offer a shared option that has safety and health protocols to keep riders safe, while still cutting down on emissions.

Electric AV fleets like Cruise's can also help bridge the rural - urban divide in California and support more equitable electrification. Beyond its commitment to use renewable energy to power its vehicles, Cruise also launched a program earlier this year called Farm to Fleet, where it has begun sourcing its renewable electricity directly from family owned farms in California's Central Valley. This program has created new revenue streams for California farmers - a critical benefit given the continued risk of drought and wildfire to these local businesses.

Cruise has also been leading the industry in terms of EV adoption. In light of the Governor signing Senate Bill (SB) 500 (Min, 2021), all new light-duty autonomous vehicles must now be electric by 2030. Cruise already complies with the law, utilizing a 100 percent-electric fleet of vehicles, powered in California by 100 percent renewable energy. Furthermore, Cruise is already in compliance with the Clean Miles Standard - currently under deliberation by the CPUC - and remains the first, and only, AV ridehailing operator to deploy a fully electric fleet in California.

But beyond the benefits of Cruise's deployment at scale, Cruise has also helped serve a public good today. Cruise's fleet of 100%-electric, self-driving vehicles have helped deliver more than 1.8 million meals to San Franciscans in need since the start of the COVID-19 pandemic, in partnership with the San Francisco Marin Food Bank and San Francisco New Deal.

Conclusion

For the reasons cited above, I urge CPED AV Programs to move forward on this application as expeditiously as possible. Deployment of electric AV ridesharing in California will have long-lasting impacts on the success of the state's ambitious electrification targets. Please do not hesitate to contact me at dylan@caleec.com if I can be of further assistance.

Sincerely,

[Dylan Jaff](#)

Government Affairs

Electric Vehicle Charging Association

cc: Marybel Batjer, President, CPUC

Cliff Rechtschaffen, Commissioner, CPUC
Martha Guzman Aceves, Commissioner, CPUC
Genevieve Shiroma, Commissioner, CPUC
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