

Alicia Fenrick
Associate General Counsel
Cruise LLC
333 Brannan St.
San Francisco, California 94107

February 24, 2022

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

Re: Drivered AV Passenger Service Pilot Program Exemption Request

Dear Consumer Protection & Enforcement Division,

Cruise¹ respectfully submits this request pursuant to General Order (G.O.) 157-E, Part 8.02 for a renewal of its limited exemption from Charter-Party Carrier (TCP) regulations for participants in the California Public Utilities Commission's (Commission) Drivered Test Autonomous Vehicles Passenger Service Pilot Program (Drivered AV Pilot).² We submit this request in connection with Cruise's existing TCP authority (TCP 39080). 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 previous exemptions the Commission approved in connection with Cruise's participation in the Commission's Drivered Test Autonomous Vehicles Passenger service Pilot Program.³

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.⁴ Cruise seeks to list on its equipment list vehicles owned by General Motors Company LLC ("GM"), which has a controlling interest in Cruise.⁵ 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

¹ Cruise LLC.

² This exemption expires 12 months after it was granted pursuant to G.O. 157-E Part 8.02. The grant date was June 02, 2021.

³ available at:

<https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/consumer-protection-and-enforcement-division/documents/tla/b/av-programs/drivered-pilot-exemption-renewal-request-under-general-order-157e-part-802--cruise-exemption-renewal.pdf>.

⁴ See also D.18-05-043 at 15; AV Pilot application packet Form PL-664-AV.

⁵ 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.

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 renewal.

Sincerely,

DocuSigned by:

Alicia Fenrick

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Alicia Fenrick

Associate General Counsel

Enclosure: Declaration of A. Fenrick

DECLARATION OF ALICIA FENRICK
IN SUPPORT OF CRUISE LLC'S REQUEST FOR EXEMPTION RENEWAL

I am an Associate General Counsel of Cruise LLC ("Cruise"), a Delaware limited liability company, and wholly-owned subsidiary of GM Cruise Holdings LLC ("Cruise Holdings"), a Delaware limited liability company, in each case, headquartered at 333 Brannan St., San Francisco, California, 94107.

I submit this declaration in support of Cruise's Exemption Renewal Request under General Order ("G.O.") 157-E, Part 8.02, in connection with Cruise's charter party carrier authority (TCP 39080).

1. Cruise is insured under an auto liability policy that covers the vehicles it intends to use in the pilot as well as the vehicle operators. The applicable insurance policy meets the standards set by the Commission's General Orders, decision 18-05-043, and statutory requirements. GM's Auto Liability policy extends to Cruise's AVs. In the event of an accident, GM's Auto Liability policy would respond as it currently does for GM owned AVs.

2. Cruise maintains control over Cruise AVs (even if the vehicles are owned by GM).

3. General Motors Company ("GM"), through its wholly-owned subsidiary, General Motors Holdings LLC, has a controlling interest in Cruise Holdings and subsequently in Cruise. Title to AVs for the AV Pilot will be held by GM or its subsidiaries. Cruise will manage all operations and vehicles involved in the Pilot.

Dated this 24th day of February 2022.

DocuSigned by:
Alicia Fenrick
C7097063861D4CD

Alicia Fenrick
Associate General Counsel
Cruise LLC