



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

November 5, 2021

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

Re: Driverless Deployment Program Exemption Request

Dear Consumer Protection & Enforcement Division,

Cruise LLC ("Cruise") 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 8.01 for a limited exemption from Charter-Party Carrier (TCP) regulations for participants in the California Public Utilities Commission's (Commission) Autonomous Vehicle (AV) Driverless Deployment Program ("Driveless Deployment Program"). We submit this request concurrently with Cruise's Driverless Deployment Permit application. The exemption described below would support the Commission's AV program goals and, if granted, Cruise's Driverless Program with the exemption approvals would remain functionally equivalent to the obligations of G.O. 157-E.

The request below mirrors an exemption granted by the Consumer Protection & Enforcement Division (CPED) for Cruise's pilot program on February 26, 2021, which provides approval of a technical exemption in conformance with Cruise's corporate structure.¹

¹ See


https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/consumer-protection-and-enforcement-division/documents/tlab/av-programs/cruise-driverless-pilot_exemption-request--exemption-request.pdf.



1) Equipment Listing. Cruise seeks an exemption under G.O. 157-E Part 8.01 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.² Cruise seeks to list on its equipment list vehicles owned by General Motors Company LLC (“GM”), which has a controlling interest in Cruise.³ Cruise will satisfy all other vehicle requirements under G.O. 157-E and Decision (D.) 20-11-046. Cruise will manage the Driverless Deployment Program, and has authority to manage or direct the use of any equipment. Should the Commission grant this exemption, Cruise’s Driverless Deployment operations will be functionally equivalent under G.O. 157-E and D.20-11-046.

Cruise respectfully requests that the Commission grant this G.O. 157-E Part 8.01 technical exemption request.

Sincerely,

DocuSigned by:

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Alicia Fenrick

Associate General Counsel

Enclosure: Declaration of A. Fenrick

² See also D.18-05-043 at 15; AV Pilot application packet Form PL-664-AV.

³ Title to AVs for Cruise’s Driverless Deployment Program 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.

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

I am the 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 Request under General Order ("G.O.") 157-E, Part 8.01, in connection with Cruise's Driverless Deployment Program application.

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 20-11-046, 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 Driverless Deployment Program will be held by GM or its subsidiaries. Cruise will manage all operations and vehicles involved in the Driverless Deployment Program

Dated this 5th day of November, 2021.

DocuSigned by:

Alicia W Fenrick

Alicia Fenrick
Associate General Counsel
Cruise LLC