

**DOCKETED**

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*Comment Received From: Candice Plotkin*  
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**Comments regarding 2021 Block Grant For Electric Vehicle Charger  
Incentive Projects**

*Additional submitted attachment is included below.*



November 8, 2019

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: 2021 CALeVIP Project Regions (Docket No 17-EVI-01)

Dear Commissioner Monahan and Energy Commission Staff:

Cruise LLC (Cruise) appreciates the opportunity to provide comments on the Proposed 2021 California Electric Vehicle Infrastructure Project (CALeVIP) Incentive Project Regions which were presented on Oct 23, 2019. CALeVIP has provided a critical source of funding in support of reaching the state of California's ambitious ZEV goals.

Cruise designs, develops and operates the largest all-electric autonomous vehicle (AV) fleet in the country. Since June 2016, and under the purview of the Department of Motor Vehicles and the California Public Utilities Commission, Cruise has been testing its autonomous vehicle technology across San Francisco. Cruise is planning to deploy an all-electric, autonomous vehicle rideshare service in San Francisco to safely connect people to the places and experiences they care about.

All Cruise AVs are 100% battery electric and zero-emission. Cruise seeks to support the transition away from privately owned, polluting gas-powered vehicles towards more sustainable transportation. Through its rideshare fleet model, Cruise aims to increase Californians' exposure and access to zero-emission transportation, regardless of one's ability to purchase an electric vehicle. Cruise is also investing in new EV charging infrastructure, helping the state meet its climate objectives and providing Californians a new, sustainable transportation option.

Cruise respectfully submits the following comments.

**The Proposed 2021 Project Regions Should Contain the Greater Bay Area**

Cruise is excited about the opportunity for projects within the greater Bay Area, including the counties of San Francisco, Alameda, Contra Costa, and Marin. These areas comprise the leading market for EV adoption in the state of California. While adoption has steadily increased, there is still an abundant need for additional charging infrastructure, particularly in urban markets like San Francisco where infrastructure can be more costly and difficult to deploy.

**The DCFC Program Requirements Should Mirror The Level 2 Program Requirements**

Cruise is also pleased to see incentives available for Direct Current Fast Chargers (DCFC), with increased funding potentially available for higher-powered charging levels. While the Site



Eligibility and Pillar Requirements for Level 2 chargers allow for both public and private projects, including those that support e-mobility and shared fleets, Cruise questions why the DCFC requirements differ.

Recent studies have shown that the emissions benefits from electrifying vehicles for use in Transportation Network Company (TNC) and ridesharing fleets are nearly three times greater than the benefits from electrifying a privately-owned vehicle.<sup>1</sup> Urban markets such as San Francisco County, Alameda County, and Contra Costa County are ideally suited for EVs in rideshare fleets. Indeed the City of San Francisco's Climate Action Strategy relies in part on the transition of taxi fleets and key public transportation services to Zero Emissions Vehicles as these fleets may represent the highest potential for mass adoption of EVs.<sup>2,3</sup> For these fleets, Level 2 charging alone will not be sufficient to serve customer demand thereby hindering the adoption of EVs by ridesharing fleets and reducing a key lever to reducing overall GHG emissions in the state. DCFCs are critical to enabling greater access of all customers to electric vehicles, yet relying solely on publicly-available charging stations is also not sufficient.<sup>4</sup> As a result, Cruise recommends that the CAL eVIP 2021 Pillar Requirements and Site Eligibility requirements include DCFCs that can be privately owned and dedicated to rideshare fleets whose services provide customers with access to electric vehicles. In turn, the technology requirements should be modified to exclude requirements not applicable to private fleets.

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Cruise appreciates the CEC's consideration of these comments and thanks the Energy Commission for its leadership in accelerating the electrification of transportation within California. By including San Francisco and the greater Bay Area in its project regions and modifying the eligibility of DCFC projects to include private ownership dedicated to e-mobility fleets, CAL eVIP may be able to drive even greater impact in its electrification activities and accelerate the transition of rideshare fleets to all-electric vehicles.

Sincerely,

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<sup>1</sup> <https://escholarship.org/uc/item/15s1h1kn>

<sup>2</sup> [https://sfenvironment.org/sites/default/files/fliers/files/sfe\\_cc\\_climateactionstrategvupdate2013.pdf](https://sfenvironment.org/sites/default/files/fliers/files/sfe_cc_climateactionstrategvupdate2013.pdf)

<sup>3</sup> [https://sfenvironment.org/sites/default/files/fliers/files/sfe\\_tr\\_final\\_sf\\_arv\\_13\\_053.pdf](https://sfenvironment.org/sites/default/files/fliers/files/sfe_tr_final_sf_arv_13_053.pdf)

<sup>4</sup> [https://www.sfmta.com/sites/default/files/reports-and-documents/2019/07/evroadmap\\_final\\_june2019.pdf](https://www.sfmta.com/sites/default/files/reports-and-documents/2019/07/evroadmap_final_june2019.pdf)