

**DOCKETED**

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January 20, 2021

California Energy Commission  
Dockets Office  
1516 9th Street  
Sacramento, CA 95814

**RE: DRAFT 2020 INTEGRATED ENERGY POLICY REPORT UPDATE, VOLUME I; DOCKET #  
20-IEPR-01**

Cruise LLC is pleased to provide comments to the California Energy Commission (CEC) Draft 2020 Integrated Energy Policy Report (IEPR) Update, Volume I; Docket # 20-IEPR-01 which focuses on transportation's future and the transition to zero-emission vehicles (ZEVs). We thank the CEC and staff for a thorough report on the current state of California's transportation electrification efforts, and the clear recommendations for achieving the state's goals on EV adoption - including recognition of promising new technologies and business models.

Cruise is an all-electric self-driving technology company with a mission to build the world's most advanced autonomous vehicles (AVs) to safely connect people to the places, things and experiences they care about. Our company has developed a fleet of AVs with the purpose of providing service to all Californians. As the operator of the only fully-electric AV fleet in the country, we believe there is great promise in not only our business model, but overall presence. We believe centralized ridesharing fleets can be a sustainable transportation option for Californians who may never own an EV, while quickly electrifying California's transportation fleet and supporting the CEC's goals of greater overall grid health.

**Disruptive Changes to Mobility and Economic Growth and the "Three Revolutions:**

Cruise would like to thank the CEC for recognizing our company in the Draft 2020 IEPR Report Update, Volume 1 as one that is changing the transportation landscape in executing what has been termed the "Three Revolutions" in transportation: electrified transportation, autonomous vehicles, and shared mobility services. We believe that meeting California's climate goals means being intentional, strategic, collaborative and creative in our collective approach. It is our view that automated driving and electrification are uniquely positioned to help transform California's transportation landscape. As the study by the Union of Concerned Scientists noted in the report, electrified ridesharing service vehicles "generate 53 percent fewer GHG emissions than

fossil-fuel vehicles.”<sup>1</sup> Cruise’s business model of centrally owned and operated EV fleet vehicles allow us to build on these gains and reduce GHG emissions to zero. In 2020, Cruise committed to powering our fleet with 100 percent renewable energy, effectively providing the public with a fully sustainable, zero-emission transportation service. If properly considered and supported, innovative business models and new technologies like these could be instrumental in accelerating transportation electrification and emissions reductions. Cruise is supportive of the recommendations included in the report, and looks forward to working with the CEC and other agencies to help California meet its electrification goals.

### **Expanding Charging Infrastructure to Meet California’s Climate Goals**

In order to meet the goals established by Executive Order N-79-20, the state requires an expansive and reliable network of fueling infrastructure. The Draft 2020 IEPR Report Update, Volume 1 cites modeling that suggests that the state will require more than 1.5 million chargers of public or private-shared chargers<sup>2</sup> and would require additional investment, as well as new funding mechanisms, to accelerate deployment of charging infrastructure. We support the CEC’s recommendation to continue to collaborate with other state agencies to incorporate innovative business models into public programs that could help achieve the targets of Executive Order N-79-20 while also maximizing public investment to deliver the most benefits for sustainable transportation.

EV ridesharing fleets -- such as Cruise’s -- provide access to green miles for the public, regardless of vehicle ownership. While EV fleet chargers are often private due to charging coordination and maintenance requirements, these vehicles still directly serve the public. As the CEC evaluates charging infrastructure incentives, the benefits of greater public access to green miles from models like EV fleets should be taken into account. Private chargers for these business models align with the goals of programs designed to expand EV charging infrastructure. In fact, they may actually serve more members of the public than traditional public chargers, which are only accessible to those who own an EV.

We appreciate the CEC’s acknowledgement of the “soft costs” associated with charging infrastructure development and its recommendation that future policies and programs look to reduce these costs.<sup>3</sup> In previous formal comments submitted to the CEC (Staff Workshop on Funding Allocations for Future Electric Vehicle Infrastructure Projects in Docket # 20-TRAN-04), Cruise noted that one of the biggest challenges for EV fleet operators and other e-mobility

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<sup>1</sup> CEC *Draft 2020 IEPR Update, Volume I: Blue Skies, Clean Transportation*, 44

<sup>2</sup> *Ibid*, 80-81

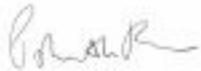
<sup>3</sup> *Ibid*, 86

providers is the considerable project finance costs involved in site development, including long lead times for site electrification, considerable back end infrastructure costs, and delays in EV site permitting. We look forward to collaborating with the CEC on future programs that can help address some of these long-standing challenges.

**Conclusion**

Cruise thanks the CEC and its staff for compiling a thorough Draft 2020 IEPR Report Update, Volume 1 as well as for the opportunity to submit comments on these important policy matters. These future programs will have long-lasting impacts on the success of the state's ambitious electrification targets. We look forward to continued cooperation and dialogue.

Respectfully,



Prashanthi Raman  
Director, Global Government Affairs  
Cruise LLC