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Cruise LLC Comments - Staff Report on Assembly Bill 2127 Electric Vehicle Charging Infrastructure

Additional submitted attachment is included below.



February 26, 2021

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

RE: CRUISE LLC COMMENTS ON STAFF REPORT - ASSEMBLY BILL 2127 ELECTRIC VEHICLE CHARGING INFRASTRUCTURE; DOCKET # 19-AB-2127

Cruise LLC appreciates the opportunity to provide comments on the California Energy Commission (CEC) Staff Report on the Assembly Bill (“AB”) 2127 Electric Vehicle Charging Infrastructure Assessment (“Report”). We thank the CEC and its staff for thoughtful engagement with a diverse group of stakeholders, a thorough report on the current state of California’s transportation electrification infrastructure efforts, and the clear actions outlined that can support quicker deployment of electric vehicle (“EV”) infrastructure to achieve the state’s ambitious EV adoption goals. Specifically, our comments will focus on Cruise’s support of the Transportation Electrification Regulatory Policies Act (TERPA), which we view as a critical step towards enhancing EV deployment in California.

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 ridesharing service to all Californians. As the operator of the only fully-electric AV fleet in the country, we believe there is great promise in business models, such as ours, which provide EV access regardless of vehicle ownership. We believe centralized EV ridesharing fleets can be a sustainable transportation option for Californians who may never own an EV or lack access to charging. Centralized fleets like ours also allow for fast and efficient electrification of California’s transportation stock and support the CEC’s, and other regulatory agencies’, goals for a stronger, more resilient, electric grid.

Cruise Supports the Report’s Inclusion of Innovative Business Models and Financing Mechanisms

Cruise applauds the CEC staff for the Report’s recognition and inclusion of new and novel business models like EV ridesharing fleets. Continued investment in new and existing models is

needed in order to achieve the state's EV goals. Approaches that can lead to a self-sustaining private market, while presenting valuable ways to electrify and provide the public with greater access to sustainable transportation should be implemented and resourced.

It is our view that the TERPA program holds great promise for reaching our state's ambitious transportation electrification goals. Cruise strongly supports the program goals and looks forward to continuing to work with the CEC to advance this program. The program provides a possible pathway for *leveraging limited public funds* for charger deployment, and does so in a manner that can bring more private investment to the market and allow for broader participation of *innovative technologies* in a fair and business model-agnostic way. As shared in our prior comments, we believe that vehicle ridesharing fleets can provide more access to *green miles for the public*, regardless of vehicle ownership. And despite our chargers not being readily accessible to the general public due to charging coordination and maintenance requirements, they will directly serve the public 100 percent of the time. The "cost of enabled charging concept," captures this value and while novel, we believe this is a reasonable approach that reduces existing barriers for innovative businesses. This concept could *increase the number of installations*, thereby creating more jobs for Californians and *accelerating transportation electrification in the state*. It is our view that this program is an opportunity for the CEC to harness and channel innovation that could deliver outsized gains for the Commission's electrification goals and Governor Newsom's Executive Order N-79-20.

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 deployed 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. Additionally, we recommend that the CEC collaborate with other state agencies to incorporate innovative business models into other public programs that could help achieve the state's EV adoption targets while also maximizing public investment to deliver the most benefits from sustainable transportation.

Standardizing and Streamlining Permitting Processes and Charging Hardware and Software

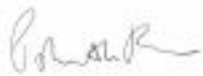
Cruise supports efforts to streamline and standardize local permitting processes. As stated in our comments to the Staff Workshop on Funding Allocations for Future Electric Vehicle Infrastructure Projects (Docket # 20-TRAN-04), there are significant project finance costs involved in site development, including long lead times for site electrification, considerable back end infrastructure costs, and delays in EV site permitting. We support the CEC's effort to address these challenges.

Furthermore, Cruise supports the spirit of the report's recommendations around prioritizing standardized and interoperable charger connectors and communications. With regards to interoperable charger connectors, Cruise believes that moving towards universal standards is one of the clearest ways to encourage greater EV adoption among the public and most optimal and efficient use of charging infrastructure. Furthermore, it is also important to encourage universal communications that can help unlock some of the greatest benefits of electric vehicles for grid health. Standards like ISO 15118 represent potential ways to achieve these opportunities by preparing our infrastructure for future vehicles and their associated communications and grid benefits.

Conclusion

Cruise thanks the CEC and its staff for compiling a thorough Staff Report on AB 2127 Electric Vehicle Charging Infrastructure Assessment, 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. Please do not hesitate to contact us if we can be of assistance.

Respectfully,



Prashanthi Raman
Director, Global Government Affairs
Cruise LLC