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**Cruise Comments - Zero-Emission Vehicle Infrastructure Plan (ZIP)  
Workshop**

*Additional submitted attachment is included below.*



February 4, 2022

## **California Energy Commission**

Comments in Response to ZEV Infrastructure Plan Workshop

Docket No. 21-TRAN-03

Cruise LLC (“Cruise”) appreciates the opportunity to comment on the ZEV Infrastructure Plan (“ZIP”) being developed by the California Energy Commission (“CEC”) and other state agencies. As California evaluates the pathways for success in achieving its ZEV targets - including Governor Newsom’s Executive Order N-79-20 - strategies like the ZIP will be crucial in not only establishing our goals and approach in the near-term, but also in setting long-term policy approaches to best leverage emerging innovative ZEV technologies.

In response to the initial public workshop hosted on January 20, 2022, Cruise offers the following thoughts and feedback on the ZIP, including valuable areas for the CEC to consider as it conducts its infrastructure scoping assessment and deployment plan.

### **Cruise’s Alignment with ZIP Principles**

Cruise is a shared, all-electric, self-driving vehicle service based in San Francisco, California. Our mission is to provide safer, cleaner, and more inclusive transportation, including ride sharing and delivery, to the public. As a fundamentally shared platform, Cruise believes that our service can be a valuable asset in achieving California’s vision for sustainable transportation by democratizing access to clean, electric miles - regardless of whether you can afford an electric vehicle or easily access a charger.

Cruise is therefore strongly supportive of the principles and goals outlined at the workshop, including state investments to maximize equitable electrification outcomes, as well as efforts to mature the ZEV infrastructure market. Cruise agrees with the principles established in the ZIP, and more generally reflected in Governor Newsom’s proposed budget, that state investments in ZEVs and supporting infrastructure must be equitable and inclusive.

### **Cruise’s Recommendations for ZIP Market Segment Evaluation**

Given the comprehensive and long-term scope of the ZIP, Cruise recommends that the CEC adopt maximum program flexibility when evaluating market segments within the ZIP - particularly where emerging use cases and business models are challenging traditional assumptions of infrastructure project design. From Cruise’s perspective, this includes both “emerging technologies for vehicles and infrastructure” and “DCFCs for light duty EVs”, as well as the impact of state infrastructure investments in those market segments.



**Rapid Evolution in California's ZEV Infrastructure Landscape:** ZEV infrastructure programs and planning in California have historically targeted personally-owned light duty EVs and associated publicly-accessible and home charging, as they have traditionally been the only available options for electrification. However, a variety of new technologies and use cases have dramatically expanded this "traditional" ZEV market, providing California with a suite of new tools to rapidly accelerate transportation decarbonization. New use cases like electrified ridehailing, electric delivery fleets, hybrid public-private charging models, and medium/heavy-duty ZEVs have emerged as attractive complements to personally-owned light duty ZEVs and their supporting infrastructure.

Cruise commends the CEC's initiative in responding to the incremental maturation of the ZEV market through a variety of innovative new grants. This includes the EnergIIIZE block grant program, as well as the CARTS, REACH, and REV grants among others - each targeting emerging use cases that can help spur equitable electrification and support the state's goals. Cruise recommends this same inclusive approach be reflected in the ZIP, given how each of these programs can help address long-term challenges in ZEV infrastructure readiness, including overcoming charger availability for multi-unit dwelling residents, households who may not have access to affordable ZEVs, and charging access in low-density areas.

**Shared Charging Sites Present Unique Value for California's Goals:** Cruise would like to highlight one specific use case in particular that presents unique value for achieving the goals of the ZIP - co-located shared public-private charging hubs, as targeted in the CARTS grant. This use case could support the ZIP through more equitable access to sustainable transportation and accelerating ZEV infrastructure market maturity. This innovative infrastructure use case can help deliver more clean miles to more people by capturing multiple use cases (personal EVs, ridesharing, and fleets). This in turn increases the impact of state investments through higher asset utilization (maximizing public infrastructure spending), while also improving the financial viability of infrastructure projects through predictable, consistent, and high-usage fleet charging activities. Additional emerging technology solutions could amplify the benefits of this site design, such as centralized fleet management, autonomous driving, optimized charging strategies, V2G connectivity, and robotic charging.

Flexible approaches to ZEV infrastructure design, like the co-location and funding of publicly accessible and dedicated charging in the CARTS grant, will ensure that California can best harness the impact of innovative technologies in achieving its climate goals. This is especially true over the medium to long-term as new use cases and technologies continue to disrupt the ZEV market and present new solutions.

## **Conclusion**

As the CEC works to develop the ZIP over the coming months, Cruise encourages staff to consider and incorporate how these emerging ZEV technologies and use cases can be



leveraged to achieve the State's ZEV goals and support the ZIP's principles of equitable electrification and market maturation. The ZIP will be a fundamental component of California's broader ZEV Market Development Strategy. Therefore, ensuring that the ZIP is sufficiently future-proofed and future-oriented will help ensure its long-term success.

Cruise appreciates the opportunity to comment on the ZIP, and looks forward to engaging with the CEC and other agencies as this document - and other elements of the ZEV Market Development Strategy - are developed.

Sincerely,

A handwritten signature in black ink, appearing to read "David Rubin". The signature is fluid and cursive, with a large initial "D" and "R".

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