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Cruise Comments on Draft 2023-2024 Investment Plan

Additional submitted attachment is included below.

cruise

May 11, 2023

California Energy Commission
Docket Office
715 P Street
Sacramento, CA 95814

RE: Docket No. 23-ALT-01 - Cruise Comments on the Draft 2023-2024 Investment Plan Update for the Clean Transportation Program

Cruise LLC ("Cruise") appreciates the opportunity to comment on the Draft 2023–2024 Investment Plan Update for the Clean Transportation Program ("Draft Investment Plan"), which includes the allocation of Clean Transportation Program ("CTP") funding as well as clean transportation General Fund allocations projected through 2026.

While the Draft Investment Plan is still being developed, Cruise respectfully requests that CEC staff continue to incorporate the important charging use cases and infrastructure needs of light-duty fleet and rideshare electrification into the 2023-24 Investment Plan. With charging infrastructure for ridesharing and light-duty fleets representing such a potentially critical area of growth and need in the state, it is imperative that use cases like ridesharing and light-duty autonomous vehicle ("AV") fleet electrification be supported by the state to achieve our 2030 targets.

About Cruise

Cruise is a shared, fully-electric, self-driving car company based in San Francisco, California, with a mission to provide safer, cleaner, and more inclusive transportation. Our company has developed a fleet of AVs with the purpose of providing ridesharing service to all Californians. As the operator of the first fully-electric AV fleet in the country, we believe centralized electric vehicle ("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.

<u>Integrating Fleet and Rideshare Electrification into the 2023-24 Investment Plan</u>

Cruise is pleased that the Draft Investment Plan includes additional funding for light-duty vehicle infrastructure, both $13.8 million from CTP funds and $620 million in anticipated general funds. As highlighted in the Draft Investment Plan, there is still a significant investment that is needed to have the infrastructure necessary to support California's EV goals. While the CTP has funded over 23,000 chargers and California has over 87,000 chargers, the state still anticipates needing over 900,000 more chargers to meet its ZEV goals generally.[1]

Traditionally, the CTP has provided funding for a variety of charging segments, including private, public, mixed, and "shared-private" access chargers that support increased access to electrified transportation. Cruise believes that it is important to continue, and even increase, support for mixed access and private access chargers that are not directly accessible to the public but that do provide benefits to the public, especially light-duty fleet and transportation network company / transportation charter party carrier ("TNC" / "TCP") chargers. For example, 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. 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 the CTP. In fact, they may serve more members of the public than traditional public chargers, which are only accessible to those who own an EV. However, this sector, particularly the sub-sector of AV fleets, has faced challenges. The CEC's most recent AB 2127 report highlighted the gap in ridesharing charging needs, and the challenges faced by electric AV fleets operating shared private infrastructure, and noted that "modifications to program terms to enable more participation" for light duty fleets may be required.[2]

For this reason, Cruise recommends that the 2023-24 Investment Plan include funding for the deployment of both public and private charging infrastructure for TNC/TCPs and AV fleets. In fact, Cruise believes that additional attention should be paid to mixed and private access chargers given the significant charging needs for TNC/TCPs. Analysis by UC Davis found that the ratio of chargers to vehicles for EV ridesharing in California is approximately 10 times higher than for privately owned EVs.[3] Given this need, Cruise believes that the 2023-24 Investment Plan should include funding for these use cases, similar to the previous CTP funding opportunity on Charging Access for Reliable On-Demand Transportation Services ("CARTS") (GFO-21-601).

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[1] Draft Investment Plan at Table 8 and Table 6.

[2] *Assembly Bill (AB) 2127 Electric Vehicle Charging Infrastructure Assessment*, published July 2021, at 99.

[3] Dr. Alan Jenn. "Charging Forward: Deploying Electric Vehicle Infrastructure for Uber and Lyft in California". *ITS UC Davis; Pacific Southwest Region University Transportation Center.* March 2021. https://escholarship.org/uc/item/6vk0h1mj.

Additionally, we support the CEC's focus on pursuing opportunities that meet multiple state goals, such as EV deployment, equity, and workforce development goals. We encourage the CEC to continue to prioritize opportunities that maximize public investment and also believe that it is important for funding to consider cross-agency goals. For example, the California Air Resources Board ("CARB") and the California Public Utilities Commission ("CPUC") are implementing the Clean Miles Standard, which requires net zero carbon emissions for every rideshare passenger mile traveled by 2030, as well as at least 90% of vehicle miles traveled to be electric by that same year. Similarly, SB 500 will require all light-duty AV fleets to be zero emission by January 1, 2030, creating additional charging infrastructure requirements. As reflected in discussions on CARB's rulemaking, the ongoing CPUC proceeding, and in the CEC's own leadership in opportunities like the CARTS grant, significant charging infrastructure will need to be installed to support these vehicle use cases. With the amount of funding the CEC is receiving, the CEC is in a unique position to leverage these taxpayer dollars for multi-agency, broader transportation, climate, and general public goals.

Conclusion

Cruise thanks the CEC for the opportunity to provide these comments on the Draft 2023-24 Investment Plan. We look forward to continued engagement with the CEC and staff on this topic which is critical to achieving a cleaner and more inclusive transportation future for California. Please do not hesitate to contact us if we can be of assistance.

Sincerely,

/s/ Jose Alvarado
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Cruise, LLC