



April 22, 2026

Terra Curtis
Director for Consumer Protection & Enforcement Division
Transportation Licensing and Analysis Branch
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Nuro, Inc. Request for Exemption From the Commercial Registration Requirement for Drivered Pilot Program

Dear Ms. Curtis:

Nuro, Inc. ("Nuro") respectfully requests an exemption pursuant to Part 8.02 of General Order ("GO") 157-E from the commercial vehicle registration requirement for the company's Lucid Gravity vehicles that Nuro seeks to add to its Drivered Pilot Program permit under California Public Utilities Commission ("CPUC") Decision 18-05-043. This letter is being submitted concurrently with Nuro's application for a Drivered Pilot Program permit.

Background

GO 157-E, Part 4.01 requires charter-party carriers (including Drivered Pilot Program permit holders) to maintain updated equipment lists. The associated form for this requirement, Form PL-664, requires that a copy of the current commercial vehicle registration accompany each vehicle addition.

Nuro's proposed Drivered Pilot Program fleet includes Toyota Prius vehicles that Nuro operates under commercial registrations, and Lucid Gravity vehicles that Nuro operates under manufacturer registrations. Both vehicle platforms are listed on Nuro's Driver-in Autonomous Vehicle Test Permit (AVT028) issued by the California Department of Motor Vehicles. Nuro requests an exemption from the commercial registration requirement to permit the inclusion of Nuro's Lucid Gravity vehicles on Nuro's equipment list and operation under the CPUC Drivered Pilot Program.

Consistency with the CPUC's Purpose for the Pilot Program

The CPUC established the Drivered Autonomous Vehicle Pilot Program both to facilitate the safe introduction of autonomous vehicle passenger service, as well as to create a way for the Commission to gather data to inform the development of a permanent regulatory framework. Granting this exemption is fully consistent with these purposes because it would enable Nuro to operate its Lucid Gravity vehicles as part of the Drivered Pilot Program. This will both expand the size of Nuro's autonomous passenger service under the pilot, and would extend the scope



of operational data collected across to include an additional vehicle platform, all without negatively affecting passenger safety.

Functional Equivalence of Operations

Nuro attests that, if this exemption is granted, its operations will be functionally equivalent to the operations otherwise required by GO 157-E. Specifically:

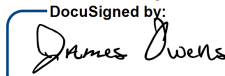
- *Identical operations across platforms.* The Lucid Gravity and Toyota Prius vehicles will be operated under the same safety protocols, operational procedures, insurance coverage, data collection and reporting practices, driver training and qualification standards, and passenger protections. There will be no operational distinction between the two platforms.
- *Safety and maintenance of vehicles.* Both vehicle platforms will be maintained and inspected under the same standards and schedules, which meet or exceed the requirements of GO 157-E and Decision 18-05-043. Every vehicle will be operated by a trained safety driver at all times during pilot operations.
- *Insurance.* Nuro will maintain insurance coverage for all pilot program vehicles that meets or exceeds the requirements of GO 157-E and Decision 18-05-043. Insurance coverage will not vary based on a vehicle's registration type.

The sole operational difference between the Lucid Gravity and Toyota Prius vehicles will be the administrative classification of their license plates. Every other aspect of Nuro's operations—including passenger safety, insurance, driver training, and data reporting—will be identical between the two vehicle platforms.

Conclusion

Nuro respectfully requests that Commission staff grant this exemption pursuant to Part 8.02 of GO 157-E, permitting Nuro to operate Lucid Gravity vehicles with manufacturer registrations in its Drivered Pilot Program alongside its commercially registered Toyota Prius vehicles. Nuro is available to provide any additional information the Commission may require.

Respectfully submitted,

DocuSigned by:

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James Owens

Chief Legal Officer, Nuro, Inc.

ATTESTATION OF JAMES OWENS IN SUPPORT OF NURO'S REQUEST FOR EXEMPTION FROM COMMERCIAL REGISTRATION REQUIREMENT

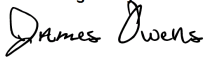
I, James Owens, declare as follows:

1. I am the Chief Legal Officer of Nuro, Inc. ("Nuro"). I have personal knowledge of the matters set forth in this attestation, and if called upon to testify, I could and would competently testify to the matters stated herein.
2. I submit this attestation in support of Nuro's April 22, 2026, request for an exemption pursuant to Part 8.02 of General Order ("GO") 157-E from the commercial vehicle registration requirement of the California Public Utilities Commission ("CPUC") Drivered Pilot Program, to permit the inclusion of Nuro's Lucid Gravity vehicles, operated under manufacturer registrations, on Nuro's Drivered Pilot Program equipment list alongside Nuro's commercially registered Toyota Prius vehicles.
3. I attest that, if the requested exemption is granted, Nuro's operation of its Lucid Gravity vehicles with manufacturer registrations will be functionally identical to Nuro's operation of its Toyota Prius vehicles with commercial registrations. The sole difference between the two platforms will be the administrative classification of their registrations and license plates; all other aspects of Nuro's operations under the Drivered Pilot Program will be unaffected by the registration classification.
4. To ensure that Nuro's operations under the Drivered Pilot Program remain functionally identical regardless of registration type, Nuro has implemented and will maintain the following measures:
 - a. **Registration-Neutral Safety Protocols.** Nuro applies a single set of safety protocols, operational procedures, and standard operating procedures to the Drivered Pilot Program as a whole. The protocols applicable to any given vehicle are determined by the characteristics of that vehicle and the requirements of the program—not by the vehicle's registration type. Nuro's operational policies contain no provision that varies based on registration classification.
 - b. **Uniform Driver Training and Qualification.** All safety drivers operating in Nuro's Drivered Pilot Program complete training and satisfy qualification standards appropriate to the vehicle platform they operate. Driver assignments, supervision requirements, and qualification standards are not differentiated by registration type, and every passenger-carrying trip will be supervised by a trained safety driver at all times, consistent with the requirements of Decision 18-05-043.

- c. **Registration-Neutral Maintenance and Inspection.** Nuro's maintenance and inspection program applies to the entire Drivered Pilot Program fleet. While maintenance activities appropriately reflect each platform's specifications and manufacturer requirements, the standards, rigor, and cadence of inspection and servicing do not vary based on registration type, and in all cases meet or exceed the requirements of GO 157-E and Decision 18-05-043.
 - d. **Insurance Coverage.** Nuro will maintain insurance coverage meeting or exceeding the requirements of GO 157-E and Decision 18-05-043 for every vehicle operated in the Drivered Pilot Program. Coverage limits, scope, and terms will not vary based on a vehicle's registration type. Nuro's insurance policies are structured to cover all pilot program operations on a uniform basis.
 - e. **Consistent Passenger Protections.** All passenger-facing protections—including consent procedures, service terms, accessibility practices, and complaint-handling processes—will be applied uniformly across the pilot program, without regard to the registration type of the vehicle in which a passenger is transported.
 - f. **Reporting Framework.** Reports submitted to the CPUC pursuant to Decision 18-05-043 and related requirements will encompass all vehicles on the same basis, and Nuro will not segregate or differentiate data collection or reporting practices by registration type.
 - g. **Unified Equipment List Management.** Nuro will maintain all vehicles operating under its Drivered Pilot Program permit on a single equipment list, updated in accordance with Part 4.01 of GO 157-E, regardless of registration type.
 - h. **Internal Compliance Oversight.** Nuro's compliance and legal functions will monitor adherence to these uniform practices and will promptly notify the Commission of any material change that could affect the functional equivalence described herein.
5. I understand that the Commission's grant of the requested exemption would be made in reliance on the representations in this attestation, and Nuro accepts a continuing obligation to ensure that its operations remain functionally identical across all vehicle platforms for the duration of the Drivered Pilot Program permit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 22nd day of April, 2026.

DocuSigned by:

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James Owens
Chief Legal Officer, Nuro, Inc.