

May 15, 2026

## SUPPLEMENTAL ADVICE LETTER 0004-A (Tier 2)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Waymo, LLC (TCP0038152A) (Waymo) submits this Supplemental Advice Letter 0004-A in response to Consumer Protection and Enforcement Division's (CPED) May 1, 2026 request for additional information. This supplement does not replace or revise any portion of Waymo Advice Letter No. 0004 but provides additional information as requested by CPED pursuant to General Rule 7.5.1 of General Order 96-B.

This supplemental Advice Letter 0004-A is being served on May 15, 2026 on the service lists for Rulemakings (R.) 25-08-013, 12-12-011, R.19-02-012, and 21-11-014, in addition to parties who submitted protests or responses to Advice Letter 0004. Because Supplemental Advice Letter 0004-A does not change or modify Advice Letter 0004, Waymo submits that no further protest period is necessary or appropriate.<sup>1</sup>

Respectfully,

DocuSigned by:  
  
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Enclosure: Supplemental Advice Letter 0004-A Attachment A

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<sup>1</sup> See e.g. Resolution E-5119, *Re PG&E request for approval of three QF power purchase agreements and associated cost recovery*, 2021 Cal.PUC LEXIS 162 (Commission declined request to reopen protest period on the grounds that the supplement did "not constitute a substantial change from what was originally requested" in the advice letter); Resolution E-4329, *Re SCE proposal to make certain modifications to its tariff rules*, 2010 Cal. PUC LEXIS 668 (Commission did not reopen protest period for supplemental advice letter where supplement "does not raise any new issues beyond the scope of the original AL.")

**SUPPLEMENTAL ADVICE LETTER 0004-A (Tier 2)  
ATTACHMENT A**

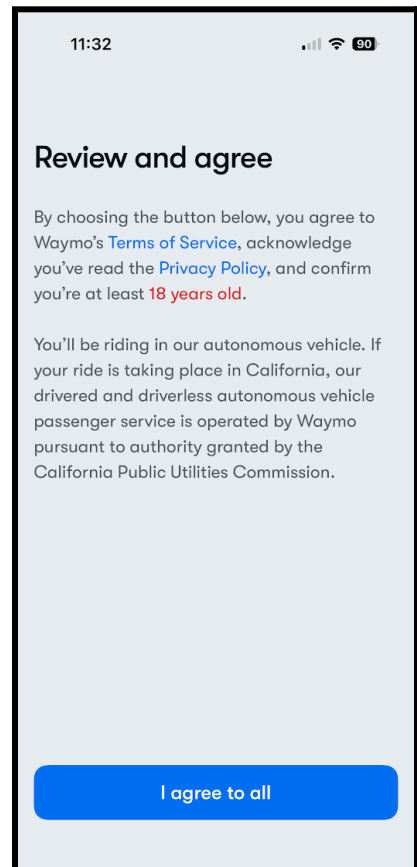
**Waymo Procedures To Prevent Unaccompanied Minors from Riding in Waymo AVs**

As stated in Waymo’s Passenger Safety Plan (PSP), Waymo account holders in California must be at least 18 years of age. (PSP, Sect. VII.B, p. 28, approved by the Commission in May 2025).

**1. Waymo Terms of Service and Account Onboarding Process**

Waymo works to prevent unaccompanied minors from riding in Waymo AVs in California by implementing various account holder requirements, including but not limited to:

- *Prohibition on Using Account to Arrange Trips for Unaccompanied Minor Riders:* Waymo’s [Terms of Service](#) and [Rider Rules](#) state that riders must be at least 18 years of age to use Waymo in California without an accompanying adult, and include an express prohibition on account holders allowing minors to ride unaccompanied by an adult. (PSP, Sect. IV, p.9).
- *Age Requirement:* All prospective California account holders must also affirm that they are at least 18 years of age to open a Waymo account. This requirement is prominently highlighted during the onboarding process. (PSP, Sect. IV.B, p.10).
- *Google Account Integration:* Waymo also blocks creation of a Waymo account by any user attempting to register using a Google account identified by Google as being age-restricted. Waymo accounts currently can only be created by registering with a Google email address.



**2. Detection and Intervention in Waymo AVs**

Waymo has developed and implemented capabilities to enhance detection of unaccompanied minor riders during trips for its California operations. This includes interior camera checks to detect and flag potential unaccompanied minors. However, for older teens in particular, it is not

always feasible to reliably determine whether they are under 18 years of age based on physical appearance.

When Rider Support becomes aware of a possible unaccompanied minor in a Waymo AV, whether through camera check or through independent discovery while performing other support tasks (such as responding to a rider call), Rider Support will ask the rider to confirm their age and, if Rider Support has reason to believe the potential minor is riding on someone else's account, may also contact the account holder for further age verification.

### **3. Response to Unaccompanied Minors in Waymo AVs**

Where a potential unaccompanied minor rider is identified, Rider Support will call into the Waymo AV to confirm the rider's age and verify that they are wearing a seatbelt. (PSP, Sect. V, p.19). Rider Support will also attempt to contact the account holder (who may be a parent or guardian) during the ride to advise them that an unaccompanied minor using their account is riding in a Waymo AV, advise them that arranging trips for unaccompanied minors is a violation of Waymo's Terms of Service, and warn them that repeated violations will result in account suspension. If the unaccompanied minor rider is the account holder, the account will be deactivated.

Rider Support may also call emergency services, as appropriate (e.g. if the minor expresses that they are in danger or the vehicle cannot proceed). (PSP, Sect. VI.A, p.21). For younger minor riders, Rider Support will call the account holder to coordinate drop off and will monitor the trip to completion. (PSP, Sect. V, p.19).

Waymo's Teen Accounts program (currently exclusive to Arizona) allows teens 14-17 to create a Waymo account and ride with Waymo. Teen Accounts incorporate enhanced features, including real-time trip sharing, automatic receipt sharing, and parent/guardian contact information linked to their teen rider's account.

### **4. Terms of Service Enforcement**

Waymo's policies and practices are designed to prevent unaccompanied minors from utilizing Waymo's service in California. However, violations of our Terms of Service nevertheless occur. Accordingly, when unaccompanied minors are identified in Waymo AVs, Waymo enforces its Terms of Service by applying "strikes" or by deactivating rider accounts, depending on the circumstances.

- *Violations by Adult Account Holders facilitating rides for unaccompanied minors:*
  - First Violation: An adult account holder that lets a minor ride unaccompanied may receive a warning that reiterates Waymo's age restriction and informs them that any future violations will result in deactivation of their account.

- Subsequent Violation: If a second violation is assessed, the account is typically deactivated, prohibiting any further use of Waymo services.
- *Violations by Unauthorized Minor Account Holders:*
  - If the account holder is a minor, the account is deactivated.
- *Further Review:*
  - Certain Terms of Service violation cases, including when Rider Support believes a rider may be misrepresenting their age or account holder status, may be escalated for further internal review.

Waymo believes that its procedures and practices to prevent unaccompanied minors from utilizing Waymo's service are reasonable, effective, and strike an appropriate balance between compliance, respecting rider privacy, and promoting public safety. Waymo conducts appropriate outreach and enforcement of its Terms of Service where riders violate Waymo's age restrictions. Waymo is also continuously evaluating its procedures for potential refinements that would increase efficacy of these measures.

## **Waymo Procedures Related to Rider Safety During Operational Disruptions**

Waymo has developed a comprehensive set of practices and processes to promote rider and public safety during major incidents that impact operations (hereinafter “major operational disruption incidents”), such as the December 20, 2025 PG&E power outage in San Francisco (the “Outage”), as well as natural disasters like earthquakes, wildfires, and severe storms.<sup>2</sup>

Waymo uses an all-hazards approach in preparing for adverse events, meaning we design our protocols to handle a broad spectrum of disasters and focus on our incident response capabilities, rather than isolated incidents of a specific nature. As outlined in Waymo’s PSP, Waymo responds to potentially disruptive events with operational teams including: (1) Waymo Remote Assistance agents, who support Waymo AVs with information and suggestions to enhance vehicle performance; (2) the Waymo Event Response team, which manages Waymo’s response to disruptive events, including coordination with first responders; and (3) Waymo Roadside Assistance, which provides in-field assistance to Waymo AVs, including those transporting riders. (PSP, Sect. VI, p. 21).

### **1. Distinction of Adverse Events and Major Disruptions**

The primary distinction between a major operational disruption incident and a routine adverse event (such as a single isolated traffic light outage or a minor trip interruption) is the scale of the required response. In a routine scenario, the Waymo Driver (the automated driving system) can typically navigate safely on its own, such as by treating a dark traffic signal as a four-way stop, or it may issue a request to Remote Assistance agents for information, while remaining in control of the dynamic driving task. However, major operational incidents or other significant incidents trigger the activation of Waymo’s 24/7 Incident Response Team to manage widespread impacts, coordinate with local officials and first responders, and evaluate potential operational mitigations.

### **2. Triggers for Emergency Response and Resolution**

Major operational disruption incidents can be triggered either by proactive intelligence or real-time operational alerts. Waymo utilizes a suite of tools that continuously monitor threat intelligence, including U.S. Geological Survey alerts, the National Weather Service, and notifications from first responder agencies. In the case of the Outage, Waymo’s incident response was initially triggered when certain Waymo facilities lost power.

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<sup>2</sup> “Major operational disruption incident” is being used for purposes of the supplement to distinguish events like the 12/20 Outage from other Incidents, such as collisions, which do not necessarily result in broader disruption to Waymo’s operations.



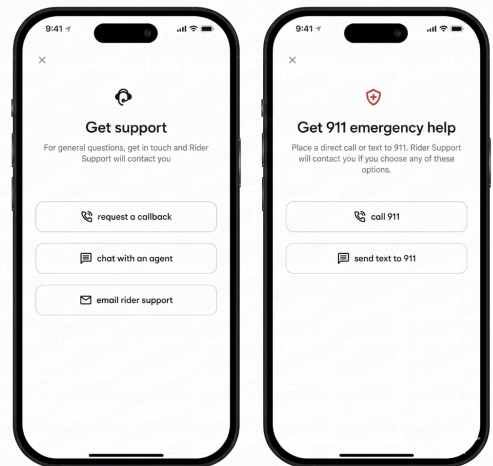
Generally, an incident is resolved after the Incident Response Team completes its technical assessment to determine the scope and circumstances of the incident and confirms that incident response is complete. In addition, major operational disruption incidents resulting in the suspension or restriction of service operations are closed after Waymo determines that normal operations can be safely restored without introducing secondary risks. This determination is made in consultation with internal and external stakeholders, as necessary. During the Outage, Waymo considered a variety of factors before closing out its Incident Response, such as the restoration of power to Waymo’s depots and

affected traffic lights and input from local officials and law enforcement.

### 3. Actions Taken to Reduce Passenger Risk and Guiding Factors

As established in Waymo’s PSP, Waymo prepares for major operational disruption incidents, as well as other events that may interrupt a trip or present a safety risk to riders through several mechanisms. Waymo also prepares for these potential adverse events through modeling various scenarios and responses. In all circumstances, the health and safety of Waymo’s riders, partners, team members, and the public is Waymo’s number one priority.

In the event of an emergency, riders can contact 911 via Waymo’s app or dial 911 directly on their phone. For all other questions or concerns, Rider Support agents are available 24/7 to assist riders. Riders can reach Rider Support via phone, chat, or email through Waymo’s app. Additionally, once in the vehicle, riders can connect with Rider Support by selecting the Rider Support button on the in-vehicle screen to communicate via the Waymo AV’s two-way communication system. (PSP, Sect. V, p. 19). Rider requests for phone, in-vehicle audio, or chat contact with Rider Support are typically answered within 60 seconds. (PSP, Sect. V, p. 20). In the event of a major operational disruption incident, Waymo has capabilities to surge operational and rider support personnel.



Depending on the nature of an incident, Waymo has a number of operational tools at its disposal. Waymo can create an avoidance area wherein Waymo places geographic restrictions

to prevent Waymo AVs from entering specified areas, such as active fire scenes or evacuation zones. Waymo can also de-fleet and remove a portion of Waymo AVs from active service, as it did during the Outage, pending the completion of active passenger trips, as well as suspend initiation of new trips through the rider app. Additionally, Waymo can direct Waymo AVs to pull over to curbside parking spaces out of active travel lanes, among other operational mitigations.

Waymo considers several factors in determining how to respond to incidents. As noted, rider, partner, and team safety are paramount. Waymo also considers the impact on the community when making operational decisions and assessing incident response. Additionally, Waymo weighs the impact on service quality, as well as its AVs and facilities, when determining how to respond to incidents. While no single factor is determinative, safety is always our highest priority.

#### **4. Communications with Riders / Rider Support**

Depending on the nature of an incident, riders in affected AVs may be contacted by Waymo Rider Support or other Waymo operations team personnel. In the event of a trip interruption or collision, Waymo will check on the status of riders and inquire whether emergency medical services are required. (PSP, Sect. VI(A), p. 21). Waymo may communicate with riders through the Waymo AV's two-way audio to provide updates and safety instructions. Rider Support agents will instruct riders to remain in the vehicle with their seat belt fastened but will not prevent riders from exiting the vehicle if they choose to do so. As noted in Waymo's PSP, Rider Support agents "make every effort to resolve concerns or issues raised by a rider during the initial communication and are supported by an escalation lead." (PSP, Sect. V, p. 20). Waymo AVs also have external speakers which may be utilized to provide information to persons within proximity of the vehicle. (PSP, Sect. VI(A), p. 22).

In the event a Waymo AV is not able to continue driving autonomously, Waymo will dispatch Waymo Roadside Assistance to the vehicle. Waymo Roadside Assistance personnel are trained to assist riders. (PSP, Sect. VI(A), p. 22). Additionally, if Waymo is unable to complete the trip, Waymo may offer alternative transportation options or provide the rider with a trip credit.

In practice, Rider Support prioritizes rider-initiated calls received during an active trip, through the Waymo AV's in-vehicle screen, and handles all requests for one vehicle at a time. Rider Support requests received via other means (e.g. email, in-app) are handled in the order in which the requests are received.

Waymo's incident response and rider support procedures and practices promote rider and public safety and effective management and resolution of major operational disruption incidents.