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DECLARATION OF MARI DAVIDSON IN SUPPORT OF THE REQUESTS FOR CONFIDENTIAL TREATMENT OF WAYMO LLC'S Q3-2026 (July-September) AUTONOMOUS VEHICLE DEPLOYMENT AND PILOT DATA

I, Mari Davidson, declare and state as follows:

1. I am over eighteen (18) years of age. I am Assistant General Counsel for Waymo LLC ("Waymo"). I make this declaration pursuant to the California Public Utilities Commission's ("CPUC" or "Commission") General Order 66-D.

2. Together with this Declaration, Waymo is submitting to the Consumer Protection and Enforcement Division ("CPED") its quarterly autonomous vehicle ("AV") deployment and pilot data, per D.20-11-046 (as modified by D.21-05-017) and D.24-11-002. This declaration covers the Q3-2026 driverless deployment and pilot reports for July 2026 - September 2026 data.

3. In June 2022, CPED staff issued quarterly data reporting templates in the form of an Excel spreadsheet with multiple tabs, to be used in preparing quarterly data reports in connection with the Commission's AV Deployment Programs. In December 2024, CPED staff issued updated quarterly data reporting templates. Each of the tabs within the spreadsheet contains numerous data fields.

4. Certain data fields in CPED's Excel spreadsheet seek information that implicates a protected trade secret or the privacy of Waymo's riders. As such, Waymo requests confidential treatment of the information described in Attachment A to this declaration, which includes, but is not limited to: (1) Trip-Level data (including zip code and census tract information of pick-up and drop-off locations); (2) information related to Waymo's electric vehicle charging infrastructure and vehicle charging session data; and (3) incident related data; and (4) data related to number and times of specified pick-up and drop-offs.

5. Each confidentiality claim applies to both the deployment and corresponding pilot reports where the specified column is populated in both reports.

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6. The basis for confidential treatment of these items is that the information is exempt from disclosure under the California Public Records Act based on the authority and facts described in Attachment A hereto.

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

Executed in Santa Cruz, California on 11/2/2026.

Signed by:
Mari Davidson
859282486D99437...

Signature

Mari Davdison
Assistant General Counsel
Waymo LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

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ATTACHMENT A

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Attachment A
Waymo LLC's Requests for Confidentiality Pursuant to General Order 66-D
Q3-26 AV Driverless Deployment and Pilot Quarterly Report (Due: November 2, 2026)

Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
Trip-Level Trip Data	TripStartDate	The time and date the trip was requested	Column J	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) (Pursuant to Cal. Civ. Code § 3426.1(d), "Trade secret" means "information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.") • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial	Trade secret: Trip-Level Trip Data, including TripStartDate, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Trip Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
				information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California	allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
				constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. <u>Invasion of Rider Privacy</u>: Trip-Level Data also includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
Trip-Level Trip Data	TripReqRequester Tract	Census Tract Code of Requester (at time of trip request)	Column K	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related Data By Countries Of Concern Or Covered Persons)	Trade secret: Trip-Level Data, including TripReqRequesterTract, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo

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				CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census tract, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders. U.S. Data Security Program (DSP): Trip-Level Data includes substantial compiled information about trips on Waymo's platform, including the location of the requester, pick-up location, drop off location, census tract and VIN data. To the extent such data falls within the definition of U.S.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request.
Trip-Level Trip Data	TripReqRequester Zip	Zip Code of Requester (at time of trip request)	Column L	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Trip-Level Data, including TripReqRequesterZip, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes.

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				• Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial

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					progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-level data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.
Trip-Level Trip Data	VIN	Full unredacted VIN of vehicle used	Column O	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related Data By	Trade secret: Trip-Level Data, including VIN data, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas that prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows

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				Countries Of Concern Or Covered Persons)	Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by

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					the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. <u>U.S. Data Security Program (DSP):</u> Trip-Level Data includes substantial compiled information about trips on Waymo's platform, including the location of the requester, pick-up location, drop off location, census tract and VIN data. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request.

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Trip-Level Trip Data	TripAcceptDate	The time and date at which the vehicle accepted a ride	Column S	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	Trade secret: Trip-Level Data, including TripAcceptDate, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo

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					implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.
Trip-Level Trip Data	TripPickupDate	The time and date at which the vehicle picked up the passenger	Column T	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions	Trade secret: Trip-Level Data, including TripPickupDate, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and

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				of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700("disclosure of which would constitute an unwarranted invasion of personal privacy")	which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements.

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					For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date

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					and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.
Trip-Level Trip Data	TripDropoffDate	The time and date at which the vehicle dropped off the passenger	Column U	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets	Trade secret: Trip-Level Data, including TripDropoffDate, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively

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				and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700("disclosure of which would constitute an unwarranted invasion of personal privacy")	for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze

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					the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity,

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					volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.
Trip-Level Trip Data	VMTP1	Vehicle miles traveled since the last trip while the vehicle is neither carrying passengers nor en route to picking up a passenger ("Period 1 VMT")	Column V	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Trip-Level Data, including VMTP1, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip Level-Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features,

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					and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities,

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					including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable.
Trip-Level Trip Data	VMTP2	Vehicle miles traveled between the point where the vehicle was when it accepted a trip to the point where it picked up the passenger ("Period 2 VMT")	Column W	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Trip-Level Data, including VMTP2, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights

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					into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not

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					publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable.
Trip-Level Trip Data	VMTP3	Vehicle miles traveled between the pick-up point and the drop-off point ("Period 3 VMT")	Column X	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Trip-Level Data, including VMTP3, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes.

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					The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial

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					progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data particularly valuable.
Trip-Level Trip Data	EVMT	Electric Vehicle Miles Traveled ("eVMT") over entire trip (i.e., aggregate over all periods for the trip identified in RideID)	Column Y	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Trip-Level Data, including EVMT, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes.

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					The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements,

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					marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable.
Trip-Level Trip Data	Passenger Miles Traveled	The number of passengers multiplied by the number of miles traveled with those passengers in the car ("Passenger Miles Traveled")	Column Z	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") Cal. Evid. Code § 1060 Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and	Trade secret: Trip-Level Data, including Passenger Miles Traveled, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or

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				commercial or financial information obtained from a person and privileged or confidential")	service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into

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					Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable.
Trip-Level Trip Data	PickUpTract	The census tract in which the passenger was picked up for Waybill1	Column AA	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060	Trade secret: Trip-Level Data, including PickUpTract, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great

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				• Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related Data By Countries Of Concern Or Covered Persons) CPRA Exemption, Gov't Code § 7927.700("disclosure of which would constitute an unwarranted invasion of personal privacy")	effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors

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					obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger

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					miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders. <u>U.S. Data Security Program (DSP):</u> Trip-Level Data includes substantial compiled information about trips on Waymo's platform, including the location of the requester, pick-up location, drop off location, census tract and VIN data. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of

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					such data in response to a California Public Records Act request.
Trip-Level Trip Data	DropOffTract	The census tract in which the passenger was dropped off for Waybill1	Column AB	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal	Trade secret: Trip-Level Data, including DropOffTract, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate

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				Data And Government-Related Data By Countries Of Concern Or Covered Persons) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry

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					where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders. U.S. Data Security Program (DSP): Trip-Level Data includes substantial compiled information about trips on Waymo's platform, including the location of the requester, pick-up location, drop off location, census tract

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					and VIN data. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request.
Trip-Level Trip Data	PickUpZip	The zip code in which the passenger was picked up for Waybill1	Column AC	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Trip-Level Data, including PickUpZip, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider

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				• Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet

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					utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances

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					individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.
Trip-Level Trip Data	DropOffZip	The zip code in which the passenger was dropped off for Waybill1	Column AD	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy)	Trade secret: Trip-Level Data, including DropOffZip, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to

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				CPRA Exemption, Gov't Code § 7927.700("disclosure of which would constitute an unwarranted invasion of personal privacy")	prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could

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					use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
Trip-Level Trip Data	RideIDMilesTraveledP2	Shared Miles Traveled aggregated by RideID that begins when the first passenger for the shared ride has a request accepted (i.e. start of Period 2) and ends when the last passenger for the shared ride is dropped off (i.e. end of Period 3).	Column AI	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700("disclosure of which would constitute an unwarranted invasion of personal privacy")	Trade secret: Trip-Level Data, including RideIDMilesTraveledP2, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
		For example, in a shared ride with Passenger 1 and Passenger 2 with RideID 1, enter the miles traveled from the start of Period 2 for Passenger 1 to the end of Period 3 for Passenger 2.			vehicle charging facilities. Waymo implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-level data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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Trip-Level Trip Data	RideIDMilesTraveledP3	Shared Miles Traveled aggregated by RideID that begins when the first passenger for the shared ride is picked up (i.e. start of Period 3) and ends when the last passenger for the shared ride is dropped off (i.e. end of Period 3).	Column AJ	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's	Trade secret: Trip-Level Data, including RideIDMilesTraveledP3, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Trip-Level Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Trip-Level Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
		For example, in a shared ride with Passenger 1 and Passenger 2 with RideID 1, enter the miles traveled from the start of Period 3 for Passenger 1 to the end of Period 3 for Passenger 2.		license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	implements reasonable measures to protect the confidentiality of its compiled Trip-Level Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Trip-Level Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Trip-Level Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Trip-Level Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					revealed by fleet utilization and rider data is particularly valuable. Invasion of Rider Privacy: Trip-Level Data includes substantial information about the rides completed on Waymo's platform, including the precise date and time of pick-up and drop-off, and the location of the requester, pick-up location of the passenger, and drop off location of the passenger, by zip code and census block, as well as passenger miles traveled. If made public, Trip-Level Data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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Monthly Tract Data	TripsStart; TripsEnd	For each census tract in company's ODD, the total number of trips that began (i.e., picked up a customer, start of Period 3) in that census tract; For each census tract in company's ODD, the total number of trips that ended (i.e., dropped off a customer, end of Period 3) in that census tract.	E, F	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related Data By Countries Of Concern Or Covered Persons)	Trade secret: Monthly Tract Data, specifically TripsStart and TripsEnd, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Monthly Tract Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Monthly Tract Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of the number, distance, and duration of rides completed in a particular area allows Waymo to gauge how to allocate its vehicle fleet and/or make strategic decisions on where to locate parking, maintenance, and electric vehicle charging facilities. Waymo

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					implements reasonable measures to protect the confidentiality of its compiled Monthly Tract Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Monthly Tract Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Monthly Tract Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Monthly Tract Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence

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					revealed by fleet utilization and rider data is particularly valuable. U.S. Data Security Program (DSP): Monthly Tract Data includes substantial compiled information about trips on Waymo's platform, including pick-up and drop-off numbers by census tract. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request.
Incidents-Complaints	TimeofIncident	The time and date the incident occurred.	Column B	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.")	Trade secret: Incidents-Complaints Data, including TimeofIncident (excluding TimeofIncident for collision data, which Waymo is not claiming confidentiality over), is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic

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				• Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Incidents-Complaints Data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Incident-Complaints Data, including TimeofIncident data, provides Waymo with valuable insights regarding the operating environment for its vehicles over and during the course of various time periods and informs Waymo's strategic business decisions regarding areas to prioritize investment for service improvements. Waymo implements reasonable measures to protect the confidentiality of its compiled Incidents-Complaints Data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Incident-Complaints Data has actual and potential economic value to

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					third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Incident-Complaints Data, including compiled TimeofIncident data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing and strategic decisions regarding Waymo's service and ADS that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Incident-Complaints Data, including compiled TimeofIncident data, would be exacerbated due to the emergent stage of the AV industry where competitive intelligence revealed by fleet operational data is particularly valuable.

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Incidents-Complaints	IncLat; IncLong; IncidenceTract; IncidenceZip ("Incident-Complaints location data")	Location of incident: Latitude; Location of incident: Longitude; Census Tract Code (at time of trip request); Zip Code of incident (at time of trip request)	Column C; Column D; Column E; Column F	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's	Trade secret: Incidents-Complaints location data, including IncLat, IncLong, IncidenceTract, and Incidence Zip, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Incident-Compliaints location data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of Incident-Complaints location data provides Waymo with valuable insights regarding the operating environment for its vehicles at various geographic locations in the course of operations and informs Waymo's strategic business decisions regarding areas to prioritize investment for service improvements. Waymo implements reasonable measures to protect the confidentiality of its

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				license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy) • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related Data By Countries Of Concern Or Covered Persons) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	compiled Incidents-Complaints location data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Incidents-Complaints location data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's Incidents-Complaints location data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing and strategic decisions regarding Waymo's service and ADS that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Incidents-Complaints location data would be exacerbated due to the emergent stage of the AV industry where competitive intelligence revealed by fleet operational data is particularly valuable.

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					Invasion of Rider Privacy: Incident-Complaints location data includes granular location data of particular incidents, including incidents where Waymo riders were present. If made public, Incident-Complaints location data of such granularity, volume, and with continuous reporting could, in some circumstances individually or in combination with other data, be used to identify specific individuals and track their movements even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders. U.S. Data Security Program (DSP): Incident-Complaints Data includes substantial compiled information about trips on Waymo's platform, including granular location and VIN data, census tract, and the presence of persons. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined

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					in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request.
Incidents-Complaints	VIN	Full unredacted VIN of the AV involved	Column G	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related	Trade secret: Incidents-Complaints Data, including VIN, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Incidents-Complaints data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics and rider service and product improvement purposes. The compilation of Incidents-Complaints data, including VIN data, provides Waymo with valuable insights regarding Waymo's various AV vehicle platforms and fleet composition and utilization. Waymo implements reasonable measures to protect the confidentiality of its

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				Data By Countries Of Concern Or Covered Persons)	Incidents-Complaints data, including compiled VIN data, and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of Incidents Complaints Data, including VIN data, has actual and potential economic value to third-parties. If disclosed, compiled VIN data could be analyzed by competitors or other third parties to gain valuable insights regarding Waymo's fleet utilization and composition over time. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Incidents Complaints Data, including VIN data, would be exacerbated due to the emergent stage of the AV industry where information regarding vehicle platforms and competitive intelligence revealed by vehicle platform data is particularly valuable. U.S. Data Security Program (DSP): Incident-Complaints Data includes substantial compiled information about

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					trips on Waymo's platform, including granular location and VIN data, census tract, and the presence of persons. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request.
Incidents-Complaints	CitViolation	If there was a citation associated with a trip, type of violation including specific code or regulation violated	Column AC	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial	Trade secret: Incidents-Complaints Data, including Citation data, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Incidents-Complaints data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively

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				information obtained from a person and privileged or confidential")	for business analytics and rider service and product improvement purposes. The compilation of CitViolation data provides Waymo with valuable insights regarding the operating environment for its vehicles at various geographic locations and times in the course of operations and informs Waymo's strategic business decisions regarding areas to prioritize investment for service improvements. Waymo implements reasonable measures to protect the confidentiality of its compiled CitViolation data and provides a confidential version of this data to CPED pursuant to regulatory requirements. For the same reasons, the compilation of CitViolation data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to compiled CitViolation data, they could analyze the data to gain valuable granular insights regarding Waymo's commercial progress and operating environments, conditions, and constraints encountered by Waymo's ADS, that Waymo does not publicly disclose, causing Waymo irreparable

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					harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such compiled CitViolation data would be exacerbated due to the emergent stage of the AV industry where competitive intelligence revealed by fleet operational data is particularly valuable.

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Incidents-Complaints	AssaultSexual; AssaultNonsexual; AssaultClaimaintPassengerPassenger; AssaultClaimantPassengerDriver; AssaultClaimaintDriverPassenger	Type of incident: If sexual assault (Y/N); Type of incident: If non-sexual assault (Y/N); Type of incident: If assault claimant is an AV passenger and alleged perpetrator is another AV passenger (Y/N); Type of incident: If assault claimant is an AV passenger and alleged perpetrator is the safety driver (Y/N);	Column AE-AI	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made	<u>Invasion of Rider Privacy</u>: Incidents-Complaints data related to assault incidents includes substantial information regarding incidents of a highly personal and sensitive nature. If made public, this information could be used in conjunction with other data to identify specific individuals and reveal highly private and personal information even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
		Type of incident: If assault claimant is the safety driver and alleged perpetrator is an AV passenger (Y/N).		available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	
Incidents-Complaints	HarassmentSexual	Type of incident: If sexual harassment incident (Y/N).	Column AJ	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name,	<u>Invasion of Rider Privacy</u>: Incidents-Complaints data related to harassment incidents includes substantial information regarding incidents of a highly personal and sensitive nature. If made public, this information could be used in conjunction with other data to identify specific individuals and reveal highly private and personal information even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
				signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	
Incidents-Complaints	HarassmentNonsexual	Type of incident: If non-sexual harassment incident (Y/N).	Column AK	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.")	Invasion of Rider Privacy: Incidents-Complaints data related to harassment incidents includes substantial information regarding incidents of a highly personal and sensitive nature. If made public, this information could be used in conjunction with other data to identify

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				• Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy)	specific individuals and reveal highly private and personal information even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
				CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	
Incidents-Complaints	HarassmentClaimantPassengerPassenger	Type of incident: If harassment incident claimant is an AV passenger and alleged perpetrator is another AV passenger (Y/N).	Column AL	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment,	Invasion of Privacy: Incidents-Complaints data related to harassment incidents includes substantial information regarding incidents of a highly personal and sensitive nature. If made public, this information could be used in conjunction with other data to identify specific individuals and reveal highly private and personal information even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders.

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				employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	
Incidents-Complaints	HarassmentClaimantPassengerDriver	Type of incident: If harassment incident claimant is an AV passenger and alleged perpetrator is the safety driver (Y/N).	Column AM	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal	Invasion of Privacy: Incidents-Complaints data related to harassment includes substantial information regarding incidents of a highly personal and sensitive nature. If made public, this information could be used in conjunction with other data to identify specific individuals and reveal highly private and personal information even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders and drivers.

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				information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	

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Incidents-Complaints	HarassmentClaimantDriverPassenger	Type of incident: If harassment incident claimant is the safety driver and alleged perpetrator is an AV passenger (Y/N).	Column AN	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Civil Code § 1798.80 et seq. (process for protecting customer records) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) (Civil Code § 1798.80(e) "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Invasion of Privacy: Incidents-Complaints data related to harassment includes substantial information regarding incidents of a highly personal and sensitive nature. If made public, this information could be used in conjunction with other data to identify specific individuals and reveal highly private and personal information even though the individual's name, phone number, and address are not otherwise reported. Disclosure of such information poses risks to the privacy and safety of Waymo's riders and drivers.

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				"Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.) • Cal. Const., art. I, § 1 (California constitutional right to privacy) CPRA Exemption, Gov't Code § 7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy")	
Incidents-Complaints; Incidents-Location	PUDOTravel LaneAll and PUDOTravelLane Time; PUDOTravelLane ("PUDO-related Data")	Number, times, and locations for all pickup and drop-off events where the AV is stopped more than 18 inches from the curb ("double parking").	Column AO; Column G	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under	Trade secret: While the Commission's data reporting template categorizes it as "Incidents-Complaints; Incidents-Location", for purposes of Waymo's confidentiality claims, PUDO-related Data is treated as part of the compilation of Trip-Level Data. Trip-Level Data, including PUDOTravelLaneAll and PUDOTravelLaneTime and PUDOTravelLane (collectively "PUDO-related Data"), is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. PUDO-related Data reflects

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				Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related Data By Countries Of Concern Or Covered Persons)	sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics, product and/or service personalization, and rider service and product improvement purposes. The compilation of PUDO-related Data provides Waymo with critical insights into the effectiveness and improvements of its services, features, and marketing efforts, and into areas to prioritize investment for a competitive service offering. For example, analysis of PUDOs characteristics, including the number, times, and locations, independently and together with other trip data, provides strategic insights into PUDO demand over time, rider expectations and preferences, and Waymo's efforts over time to meet those expectations and preferences to provide a competitive service offering. Waymo implements reasonable measures to protect the confidentiality of its compiled PUDO-related Data and provides a confidential version of this data to CPED pursuant to regulatory requirements.

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					For the same reasons, the compilation of PUDO-related Data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to Waymo's PUDO-related Data, they could analyze the data to gain valuable insights into Waymo's existing customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such PUDO-related Data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by fleet utilization and rider data is particularly valuable. <u>U.S. Data Security Program (DSP):</u> Trip-Level Data includes substantial compiled information about trips on Waymo's platform, including the location of the requester, pick-up

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					location, drop off location, census tract and VIN data. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request..
Incidents-Complaints	PayoutsTotal	Total payouts to parties involved in incidents, if known (dollars)	Column AV	Government Code § 7922.00, commonly known as the "catchall exemption" or the “public interest balancing test” exemption, permits agencies to withhold records if an agency determines that, on the facts of the particular case, “the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.”	"Payouts" made in connection with settlement of claims should be treated as confidential because the public interest served by withholding settlement amounts outweighs the public interest served by its disclosure. It is well established that public interest favors settlement of disputes over litigation insofar as it promotes efficiency and economy for the courts and for the parties involved. *See, e.g* ., *Kaufman v. Goldman* , 195 Cal. App. 4th 734, 745 (2011); *Osumi v. Sutton* , 151 Cal. App. 4th 1355, 1359 (2007); *Zhou v. Unisource Worldwide, Inc.* , 157 Cal. App. 4th 1471, 1475 (2007);

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					Brown v. Guarantee Ins. Co. , 155 Cal. App. 2d 679, 696 (1957); *see also* Cal. Evid. Code Sec. 1152 (Evidence that a person has "in compromise or from humanitarian motives" paid money to a claimant is inadmissible to prove liability or damages). Public disclosure of amounts paid to settle claims would discourage operators' from entering into settlements. *Application of S. Cal. Edison Co.* (Nov. 29, 1999), 2000 CAL. PUC LEXIS 371 at *9 (granting an applicant's motion for confidential treatment of the terms of the settlement of a civil lawsuit in part because disclosure of the settlement terms "could cause . . . competitive harm in negotiating settlements of future disputes involving similar issues"). The public interest in disclosure, meanwhile, is minimal; decisions to settle claims and amounts paid in connection with settlements depend on a variety of factors and are not indicative of the cause or circumstances surrounding an underlying event or actual fault, liability or wrongdoing. The Commission has previously recognized sums paid to resolve claims through settlement may be treated as confidential. *Order Instituting*

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					Rulemaking on Regulations Relating to Passenger Carriers, Ridesharing, and New Online-Enabled Transportation Services (May 5, 2022), 2022 CAL. PUC LEXIS 184 at *7 (affirming a ruling finding that "incidents might be resolved by entering into a settlement agreement . . . and the sums paid might be confidential"); *see also* R.12-12-011, *Ruling on Uber Technologies, Inc.'s and Lyft's Motion for Confidential Treatment of Certain Information in Their 2020 Annual Reports* (Dec. 12, 2020), Appendix A (granting request for confidential treatment for amounts paid to resolve complaints). Waymo is seeking confidential treatment for payouts that were provided pursuant to a settlement agreement or where there was otherwise an expectation of confidentiality. Waymo is not asserting confidentiality for non-confidential payouts, if any, that were not provided in connection with a settlement or other expectation of confidentiality.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
Incidents-Complaints	CitationPD	Type of incident: If citation issued for the pickup or drop off (Y/N).	Column AW	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Incidents-Complaints Data, including CitationPD data, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Incidents-Complaints data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics and rider service and product improvement purposes. The compilation of CitationPD data provides Waymo with valuable insights regarding the operating environment for its vehicles at various geographic locations and times in the course of operations and informs Waymo's strategic business decisions regarding areas to prioritize investment for service improvements. Waymo implements reasonable measures to protect the confidentiality of its compiled CitationPD data and provides a confidential version of this data to CPED pursuant to regulatory requirements.

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					For the same reasons, the compilation of CitationPD data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to compiled CitationPD data, they could analyze the data to gain valuable granular insights regarding Waymo's commercial progress and operating environments, conditions, and constraints encountered by Waymo's ADS that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such compiled CitationPD data would be exacerbated due to the emergent stage of the AV industry where competitive intelligence revealed by fleet operational data is particularly valuable.

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
Incidents-Complaints	CitIssuerPD	If there was a citation associated with the pick up or drop off, specific entity issuing the citation	Column AX	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: Incidents-Complaints Data, including CitIssuerPD data, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. Incidents-Complaints data reflects sensitive and valuable data that Waymo collects and maintains at great effort and expense, both individually as customer records and collectively for business analytics and rider service and product improvement purposes. The compilation of CitIssuerPD data provides Waymo with valuable insights regarding the operating environment for its vehicles in the course of operations at various geographic locations and times and informs Waymo's strategic business decisions regarding areas to prioritize investment for service improvements. Waymo implements reasonable measures to protect the confidentiality of its compiled CitIssuerPD data and provides a confidential version of this data to CPED pursuant to regulatory requirements.

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					For the same reasons, the compilation of CitIssuerPD data data has actual and potential economic value to third-parties. If Waymo's ride-hailing and autonomous driving competitors obtained access to compiled CitIssuerPD data, they could analyze the data to gain valuable granular insights regarding Waymo's commercial progress and operating environments, conditions, and constraints encountered by Waymo's ADS that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such compiled CitIssuerPD data would be exacerbated due to the emergent stage of the AV industry where competitive intelligence revealed by fleet operational data is particularly valuable.

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Chargers	ChargerID	Unique numeric or alphanumeric identifier for each charger used by one of the company's battery electric or plug-in hybrid electric vehicles.	Column D	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: The compilation of Chargers data, such as ChargerID, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number and location of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Chargers data and provides a confidential version of this data to CPED pursuant to regulatory

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					requirements. If Waymo's competitors obtained access to Waymo's Chargers data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Chargers	ChargerTract	The charger's location, by census tract.	Column E	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law,	Trade secret: The compilation of Chargers data, such as ChargerTract, is information that derives independent economic value from not being generally known to other persons who

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				including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number and location of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Chargers data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Chargers data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet

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					utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Chargers	ChargerPower	The rated power level of the charger in kilowatts.	Column F	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.")	Trade secret: The compilation of Chargers data, such as ChargerPower, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
				• Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number, location and capabilities of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Chargers data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Chargers data, they could analyze and the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Chargers	ChargerType	The type of charger (privately owned by company, residential, workplace, public, etc)	Column G	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial	Trade secret: The compilation of Chargers data, such as ChargerType, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects

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				information obtained from a person and privileged or confidential")	Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number, location and source of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Chargers data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Chargers data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Chargers	ChargerLSE	Load serving entity (i.e., utility) serving the charger and its electric rate	Column H	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: The compilation of Chargers data, such as ChargerLSE, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the

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					number, location, capability and source of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Chargers data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Chargers data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in

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					any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Chargers	ChargerRate	Load serving entity (i.e., utility) serving the charger and its electric rate	Column I	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: The compilation of Chargers data, such as ChargerRate, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number, location, capability and source of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where

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					and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Chargers data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Chargers data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding

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					product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Charging-Sessions	ChargerID	Unique numeric or alphanumeric identifier for each charger used by one of the company's battery electric or plug-in hybrid electric vehicles.	Column D	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: The compilation of Charging-Sessions data, such as ChargerID, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number, location, capability and source of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo

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					implements reasonable measures to protect the confidentiality of its compiled Charging-Sessions data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Charging-Sessions data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.

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Charging-Sessions	SessionID	Unique numeric or alphanumeric identifier for each charging session.	Column E	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: The compilation of Charging-Sessions data, such as SessionID, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number, location, capability and source of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Charging-Sessions data and provides a confidential version of this

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Charging-Sessions data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Charging-Sessions	SessionDatetime	Charging session data including time, day	Column F	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law,	Trade secret: The compilation of Charging-Sessions data, such as SessionDatetime, is information that derives independent economic value from not being generally known to

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
				including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number, location, capability and source of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Charging-Sessions data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Charging-Sessions data, they could analyze the data to gain valuable

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Category	Field Name	CPED Staff Field Description	Spreadsheet Column	Legal Basis for Confidentiality	Factual Basis for Confidentiality
					insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.
Charging-Sessions	SessionDuration	Charging session duration of charge	Column G	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060	Trade secret: The compilation of Charging-Sessions data, such as SessionDuration, is information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compilation

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				• Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	of Chargers data reflects sensitive and valuable data that Waymo collects and maintains with effort and expense for business analytics, rider service and product improvement purposes and reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. For example, analysis of the number, location, capability and source of available electric vehicle charging stations and charging duration of Waymo's AVs could reveal strategic business decisions regarding where and how Waymo has invested resources in this early stage of its attempt to create a competing ride-hailing product with a fully-electric AV fleet. Waymo implements reasonable measures to protect the confidentiality of its compiled Charging-Sessions data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Charging-Sessions data, they could analyze the data to gain valuable insights into Waymo's anticipated customer base, fleet utilization rate and optimization capabilities and requirements, marketing strategies, its commercial progress, and other critical

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					aspects of its business that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo, particularly given the limited supply of charging infrastructure in any given area. The potential harm caused by the disclosure of such Chargers data would be exacerbated due to the emergent stage of the AV industry where information regarding product services and competitive intelligence revealed by data on available and utilized infrastructure is particularly valuable.

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Stoppage-Incident	All fields in Stoppage-Incident tab (including data fields related to stoppage location, presence of passengers, stoppage resolution and all other fields in this tab including the number of rows which if disclosed would reveal the number of stoppage events)	All fields in Stoppage-Incident tab	A-AC	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential") • Data Security Program ("DSP") implemented by the National Security Division ("NSD") under Executive Order 14117, implemented in 28 CFR Part 202 (Access To U.S. Sensitive Personal Data And Government-Related Data By Countries Of Concern Or Covered Persons)	Trade secret: The Stoppage-Incident data, in its entirety, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The compiled Stoppage-Incident data, collectively and/or in combination with other data submitted to the Commission, reflects sensitive and valuable data that Waymo collects and maintains with great effort and expense for business analytics and rider service and product improvement purposes, reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. Waymo implements reasonable measures to protect the confidentiality of its compiled Stoppage-Incident data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Stoppage-Incident data, they could analyze the data to gain valuable insights regarding, for example, vehicle routing, traffic

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					patterns, and and strategic decisions regarding Waymo's service and ADS that Waymo does not publicly disclose, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such Incident-Stoppage data would be exacerbated due to the emergent stage of the AV industry where information regarding AV performance and routing is particularly valuable. <u>U.S. Data Security Program (DSP):</u> Stoppage-Incident data includes substantial compiled information about trips on Waymo's platform, including the granular location and VIN data. To the extent such data falls within the definition of U.S. sensitive personal data regardless of whether the data is anonymized, pseudonymized, de-identified, or encrypted, and in the aggregate meet the thresholds for bulk U.S. sensitive personal data as defined in 28 CFR Part 202, we recommend the Commission conduct further review, including of examples provided in 28 CFR 202 of prohibited

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					transfer of bulk U.S. sensitive personal data, for public policy interests prior to disclosure of such data in response to a California Public Records Act request.
Stoppage-Fleet	ManualCount; ManualRelaunch; ManualResponseTime; ManualResolutionTime; ResolutionAverage; ResolutionMedian; PctManual	For all stoppage events requiring manual in-person assistance, count of manual removals, count of relaunches, average response time, and average resolution time; For all stoppage events of 30 seconds or more, average resolution time, median resolution time, and percent of these events requiring	D-J	CPRA Exemption, Gov't Code § 7927.705 (which provides an exemption for "[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.") • Cal. Evid. Code § 1060 • Cal. Civil Code §§ 3426 et seq. (relating to trade secrets) • 5 U.S.C. § 552(b)(4) (Exemption 4 of FOIA protecting "trade secrets and commercial or financial information obtained from a person and privileged or confidential")	Trade secret: The Stoppage-Fleet data, is a compilation of information that derives independent economic value from not being generally known to other persons who can obtain economic value from its disclosure or use, and which is the subject of reasonable efforts by Waymo to maintain its secrecy. The Stoppage-Fleet data reflects sensitive and valuable data that Waymo collects and maintains with great effort and expense for business analytics and rider service and product improvement purposes, reflects Waymo's strategic business decisions and provides critical insights into the impact and effectiveness of those decisions. Waymo implements reasonable measures to protect the confidentiality of its compiled Stoppage-Fleet data and provides a confidential version of this data to CPED pursuant to regulatory requirements. If Waymo's competitors obtained access to Waymo's Stoppage-Fleet data, they could analyze the data to gain valuable insights regarding, for

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		manual removal.			example, fleet utilization, the operational environments for its vehicles, the state of its commercial progress, the effectiveness and improvements of its services, and areas to prioritize investment for a competitive service offering, causing Waymo irreparable harm. Other entities, including Waymo's competitors, could use such information for their own business purposes or to gain a competitive advantage relative to Waymo. The potential harm caused by the disclosure of such compiled Stoppage-Fleet data would be exacerbated due to the emergent stage of the AV industry where information regarding AV performance and routing is particularly valuable. With regards to ManualCount, Waymo is not asserting confidentiality for the number of manual retrievals from December 20, 2025 that it disclosed in Waymo's Response On the January 12, 2026 Administrative Law Judge's E-Mail Ruling Regarding Questions from January 6, 2026 E-Mail Ruling, submitted in R.25-08-013 on January 30, 2026. Waymo is claiming confidentiality over ManualCount for the rest of the quarter.