

February 24, 2026

Terra Curtis, Director
Consumer Protection and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue

RE: Reply of Waymo LLC in Support of Waymo Tier 2 Advice Letter No. 0004

Dear Director Curtis,

Pursuant to General Order (“GO”) Section 7.4.3, Waymo LLC (“Waymo”) (TCP0038152A) hereby submits its reply to the protests and responses submitted to the Commission’s Consumer Protection and Enforcement Division (“CPED”) in connection with Waymo’s Advice Letter 0004, (“Advice Letter 0004”).

On January 28, 2026, Waymo submitted Advice Letter 0004 in accordance with Decision (“D.”) 20-11-046 (as modified by D.21-05-017) (the “Deployment Decision”), and the CPUC Autonomous Vehicle (“AV”) Drivered and Driverless Pilot and Phase I Deployment Programs Application Instructions and Requirements (“Application Instructions”). Pursuant to those authorities and guidance, Advice Letter 0004 seeks CPED review and approval of Waymo’s updated Passenger Safety Plan (“Updated Passenger Safety Plan”) - a key operational component of Waymo’s existing Phase I Driverless AV Deployment Permit. Waymo’s Updated Passenger Safety Plan describes our driverless AV technology and service and provides an overview of the policies and procedures we use to minimize potential risks to passenger safety. The update also reflects Waymo’s expanded operational design domain (“ODD”) for deployment operations, which was approved by the Department of Motor Vehicles (“DMV”) on November 21, 2025, and includes DMV’s approval of Waymo’s Ojai vehicle platform and an expanded territory for deployment operations, adding additional portions of Northern and Southern California.

SUMMARY OF PUBLIC STAKEHOLDER SUBMISSIONS

As of the date of this reply, twenty-nine (29) letters supporting approval of Waymo Advice Letter 0004 from one hundred and eleven (111) organizations have been submitted to CPED.¹ Supportive responses came from a broad and diverse group of stakeholders, including organizations that, like Waymo, work to reduce roadway deaths and injuries, improve the

¹ This includes the letter of support submitted by the Integrated Community Collaborative on February 24, 2026.

independence of those with disabilities, expand transportation access for the historically underserved, and build community and opportunity through sustainability and mobility. Waymo also received supportive responses from public officials, business and trade organizations, and non-profit organizations serving communities in the new expanded service territory, among others.² Waymo is grateful for these statements of support for Waymo's Advice Letter 0004.

In addition to the above, two (2) protests were submitted by the San Diego Metropolitan Transit System ("MTS") and the San Diego MTS Taxi Advisory Committee. These protests oppose authorization of Waymo AV service in San Diego and advocate for local regulation of AV services. No other local agency or entity among the jurisdictions included in Waymo's expanded service territory served a protest or letter of opposition to Waymo Advice Letter 0004.³

² Responses in support of Waymo AL 0004 were submitted by the Bay Area Council, 3 Feet Please, 100 Black Men of the Bay Area, Inc., Advance SF, California Assembly member Josh Hoover, the California Bicycle Coalition, Silicon Valley Bicycle Coalition, the Foundation Fighting Blindness, the Golden Gate Restaurant Association, Homeboy Industries, the Hotel Council of San Francisco, Los Altos Mountain View Community Foundation, LightHouse for the Blind and Visually impaired, Braille Institute of San Diego, Self-Help for the Elderly, Northern California Spinal Cord Injury Foundation, Resources for Independent Living, Braille Institute, AbilityPath, St. Barnabas Senior Services, Curry Senior Center, United Cerebral Palsy, BORG Adaptive Sports and Recreation, Institute on Aging, TravelAbility, Disability Voices United, Fairfax-Pan Pacific Senior Citizen Club, Vista Center for the Blind and Visually Impaired, Easter Seals, Inc., Independent Living Resource Center San Francisco, National Multiple Sclerosis Society, San Diego Center for the Blind, Special Needs Resource Foundation of San Diego, Wise & Healthy Aging, Epilepsy Foundation of Northern California, Avenidas, Achilles International San Francisco Bay Area, Epilepsy Foundation of Los Angeles, Epilepsy Foundation of San Diego, California Resource Services for Independent Living, Los Angeles Seniors, Mothers Against Drunk Driving (MADD), National Federation of the Blind of California, San Mateo County Economic Development Association (SAMCEDA), San Jose Downtown Association, San Diego Regional Chamber of Commerce, San Francisco Chamber of Commerce, San Jose Chamber of Commerce, Silicon Valley Leadership Group, TEC Leimert, The Richmond Neighborhood Center, LifeMoves, San Francisco Education Fund, Santa Monica Boys and Girls Club, APA Heritage Foundation, The Los Angeles Mission, United Way of Los Angeles, Because Justice Matters, San Francisco Village, Karsh Family Social Service Center, Daly City Partnership, TEL HI Neighborhood Center, Community Youth Center, Harvest Home, Boys and Girls Club of Silicon Valley, the Community Services Agency of Mountain View, Los Altos and Los Altos Hills, Veloz, Valley Industry Commerce Association, Central City Association, Los Angeles Business Council, Los Angeles County Business Federation, Greater Los Angeles African American Chamber of Commerce, Long Beach Chamber of Commerce, Los Angeles County Economic Development Corporation, Hollywood Chamber of Commerce, and Santa Monica Chamber of Commerce; Sacramento Metropolitan Chamber of Commerce, United Way Bay Area, and the Women's Building. In addition, the Integrated Community Collaborative submitted an additional letter of support on February 24, 2026.

³ Municipalities newly added to Waymo's deployment service area via its Updated Passenger Safety Plan include those in the SF Bay Area (including but not limited to Alameda, Antioch, Berkeley, Corte Madera, Half Moon Bay, Oakland, Napa, Santa Rosa, Walnut Creek), Sacramento area (including but not limited to Sacramento, Vacaville, Vallejo), Los Angeles area (including but not limited to Long Beach, Santa Clarita, Thousand Oaks), Orange County (including but not limited to Anaheim, Irvine), and the San Diego area (including but not limited to San Diego, Chula Vista).

WAYMO'S REPLY TO PROTESTS

By Advice Letter 0004, Waymo seeks Commission approval of Waymo's Updated Passenger Safety Plan (January 2026), in connection with Waymo's expanded ODD for deployment, which the DMV approved on November 21, 2025. As amended, Waymo's DMV Deployment ODD authorizes Waymo to expand deployment operations in additional portions of Northern and Southern California, including, but not limited to, San Diego and Sacramento, and to deploy the Ojai vehicle in existing and expanded deployment territories.

San Diego MTS and the San Diego MTS Taxi Advisory Committee protests opposing Waymo's requested relief constitute impermissible attempts to relitigate issues the Commission has already decided and are not valid grounds on which to protest an advice letter, per GO 96-B. As such, they should be accorded no weight in considering the merits of Waymo's Advice Letter 0004.

1. San Diego MTS and San Diego MTS Taxi Advisory Committee fail to state a valid basis for protest under GO 96-B.

The Commission's Deployment Decision describes the driverless deployment program and the process for making changes to a permit holder's passenger safety plan.⁴ Per the Deployment Decision, "GO 96-B provides the procedural vehicle by which an entity seeks a Commission order that the requested relief is consistent with Commission policy and applicable law."⁵

Pursuant to GO 96-B Section 7.4.2, an advice letter may be protested only on specified grounds, and "may not rely on policy objections to an advice letter where the relief requested in the advice letter follows rules or directions established by statute or Commission order applicable to the [company]."⁶

GO 96-B specifies the following permissible grounds for protest:

1. The utility did not properly serve or give notice of the advice letter;
2. The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the advice letter contain material errors or omissions;
4. The relief requested in the advice letter is pending before the Commission in a formal proceeding;
5. The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or,

⁴ D.20-11 046 (as modified by D.21-05-017), p. 80.

⁵ *Id.*

⁶ *Id.*

6. The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.

While nominally styled as “protests,” the letters submitted by San Diego MTS and San Diego MTS Taxi Advisory Committee fail to state any valid grounds for protest under GO 96-B or the Deployment Decision. Neither party contests the completeness of Waymo’s application nor do they dispute or contest the adequacy of Waymo’s Passenger Safety Plan. Instead, both San Diego MTS and the San Diego MTS Taxi Advisory Committee raise general policy concerns about deployment of Waymo passenger carrier service in San Diego. As such, these submissions fail to qualify as “protests” to a company-specific advice letter within the meaning of GO 96-B and cannot serve as a basis for delaying administrative review or denying the relief requested in Advice Letter 0004.⁷

a. Demands for local control of AV operations is a matter of policy and not a proper basis to deny or condition approval of Waymo’s Advice Letter 0004.

Citing concerns about traffic disruptions caused by AV operations and competitive impacts on taxicab services in San Diego, San Diego MTS argues that local communities should have the right to vote on whether autonomous vehicle passenger services operate in their jurisdictions. Similarly, the San Diego MTS Taxi Advisory Committee opposes Waymo Advice Letter 0004 states concerns about the impacts of autonomous vehicle passenger service operations on the passenger transportation service market and the long-term viability of the taxicab industry in the San Diego region, and suggests local regulation should be permitted.

The objections raised by San Diego MTS and the San Diego MTS Taxi Advisory Committee are not appropriate grounds for protest under GO 96-B as they are policy proposals that have already been considered by the Commission in similar forms and rejected. In R.12-12-011 San Francisco sought to require that AV deployment be limited to “Sandbox Pilot Testing” conducted in collaboration with local authorities. The Commission declined to adopt this approach in the Deployment Decision on the basis that it would create a “patchwork of local regulations” and would give municipalities “veto power that would allow them to set the terms of any AV passenger service within their jurisdiction.”⁸ San Diego MTS and its Taxi Advisory Committee cannot relitigate these issues through the advice letter process.

⁷ Resolution TL-19144, FoF No. 3 (“The San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, and the Mayor’s Office of Disability jointly protested Waymo’s advice letter on the grounds that the requested permit is unreasonable given the lack of incrementalism, data transparency, and adequate reporting and monitoring. We find this not to be proper grounds for a protest and therefore treat the protest as a response to the advice letter.”)

⁸ D.20-11 046 (as modified by D.21-05-017), p. 22.

CONCLUSION

For the foregoing reasons, the protests submitted by San Diego MTS and the San Diego MTS Taxi Advisory Committee fail to state a valid basis for protest. Waymo Advice Letter 0004 complies with the requirements for passenger safety plan updates established in the Commission's Deployment Decision and should be approved on that basis.

Respectfully,

Mari Davidson

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