

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



VIA ELECTRONIC MAIL

August 14, 2026

Mari Davidson
Waymo LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

SUBJECT: Disposition of Waymo Advice Letter 0004 and 0004-A

Dear Ms. Davidson:

Pursuant to Decision (D.) 20-11-046, as modified by D.21-05-017, and Resolution TL-19137, the Consumer Protection and Enforcement Division (CPED) of the California Public Utilities Commission approves Waymo LLC's (Waymo) Advice Letter 0004 and supplemental Advice Letter 0004-A. Waymo's updated Passenger Safety Plan (PSP), submitted in connection with its expanded operational design domain (ODD) for expanded geographic deployment and its Ojai vehicle platform approved by the California Department of Motor Vehicles (DMV), is approved. A status certificate is attached for your records.

On January 28, 2026, Waymo submitted Advice Letter 0004 seeking approval of its updated PSP and thus authorization for expansion of its Driverless Autonomous Vehicle (AV) Deployment service to additional portions of Northern and Southern California and authorization for the use of the Ojai vehicle platform. San Diego Metropolitan Transit System and San Diego Metropolitan Transit System Taxicab Advisory Committee submitted protests. CPED also received 29 supportive responses. Following a request from CPED staff, Waymo submitted supplemental Advice Letter 0004-A on May 15, 2026, providing additional information on preventing unaccompanied minor riders and procedures related to rider safety during operational disruptions. CPED received eight responses and no protests following a shortened protest period.

Attachment 1 contains further discussion of Waymo's request, responses from stakeholders, and CPED's disposition.

Please contact CPED AV Programs staff at AVPrograms@cpuc.ca.gov with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Huneycutt".

Joshua Huneycutt
Manager, Transportation Licensing and Analysis Branch
Consumer Protection & Enforcement Division

Advice Letter Status Certificate

Status of Advice Letter 0004 and 0004-A as of August 14, 2026

Waymo LLC (TCP 38152)
Attention: Mari Davidson
1600 Amphitheatre Parkway
Mountain View, CA 94043

Advice Letter Subject: **Waymo-0004, Seeking approval of Waymo's updated Passenger Safety Plan in connection with Waymo's DMV-approved expansion of driverless deployment operations into additional portions of Northern and Southern California, and approval of Waymo's Ojai vehicle platform.**

Waymo-0004-A, Providing additional information on Waymo's procedures to prevent unaccompanied minors from riding in Waymo AVs and procedures related to rider safety during operational disruptions.

Division Assigned: Consumer Protection and Enforcement

Date Filed: 01-28-2026 (original), 05-15-2026 (supplemental)

Disposition: **Approved**

Effective Date: **08-14-2026**

CPUC Contact Information: AVPrograms@cpuc.ca.gov

TCP Contact Information: Mari Davidson
waymo-regulatory-permits@google.com

Attachment 1: Staff Review and Disposition

Background

In Decision (D.) 20-11-046 (as modified by D.21-05-017) (Deployment Decision), the California Public Utilities Commission (Commission or CPUC) established the criteria and requirements for Transportation Charter-Party Carrier permit holders (Carriers) to collect fares for passenger service using autonomous vehicles (AVs). The Deployment Decision builds on the Commission's earlier Decision, D.18-05-043, that sets out the requirements for Carriers to pilot passenger service using AVs without charging fares, and on the Department of Motor Vehicles' (DMV) regulations and permits for AV manufacturers.

Under California law, the DMV determines if AVs can operate on public roads.¹ To deploy AVs, the AV manufacturer must apply to the DMV for a Permit to Deploy Autonomous Vehicles on Public Streets.² DMV regulations establish the requirements for that application, including that the manufacturer identify in the application the Operational Design Domain (ODD) in which the AVs are designed to operate. The DMV reviews submitted applications, and if it determines the manufacturers have provided all required information and certifications and that the DMV is satisfied the AVs do not pose an unreasonable risk of accident, death, injury, or exacerbating injury, issues the permit.³ DMV regulations further require that manufacturers submit an amended application for public deployment prior to implementing certain changes, including changes that expand the geographic areas where AVs may operate.⁴ Manufacturers may not implement these changes prior to review and approval by the DMV.

The Deployment Decision creates two sets of requirements for Carriers wishing to collect fares for AV service—one set of requirements for service with a safety driver present in the vehicle (Drivered Deployment service) and one set of requirements for service without a safety driver (Driverless Deployment service). Given the DMV's role in regulating AVs' safe operations on public roads, the Commission's requirements focus on compliance with the DMV permitting and on issues specific to passenger service. To offer Driverless Deployment service, among other things, a Carrier must meet the requirements contained in Ordering Paragraph (OP) 7, including holding a DMV Permit to Deploy Autonomous Vehicles on Public Streets and maintaining insurance for the AVs. In addition, a Carrier must prepare a Passenger Safety Plan (PSP), and in the PSP, must describe its policies and procedures to minimize risk for all passengers in its driverless vehicles. This includes, at a minimum, how the Carrier will:

- Minimize safety risks to passengers traveling in a ride operated without a driver in the vehicle;
- Minimize safety risks to passengers traveling in a shared, driverless ride, including prevention and response to assault and harassment (only for Carriers applying to offer shared rides);

¹ Veh. Code, § 38750.

² Cal. Code Regs., tit. 13, § 228.08.

³ Cal. Code Regs., tit. 13, § 228.10.

⁴ Cal. Code Regs., tit. 13, § 228.12.

- Respond to unsafe scenarios outside and within the vehicle, such as hostile individuals;
- Educate and orient passengers about the technology, experience, and safety procedures;
- Ensure customers can safely identify, enter, and exit the AV they requested;
- Enable passengers to contact the AV service provider during the ride and ensure the passengers receive a timely and complete response;
- Collect, respond to, and retain any passenger comments and complaints; and
- Ensure the safety measures described above are accessible to and apply to all passengers, including those with limited mobility, vision impairments, or other disabilities.⁵

The Commission established an advice letter process, modeled on the rules set forth in General Order (GO) 96-B, for Driverless Deployment applications and modifications. To offer Driverless Deployment service, the Carrier must submit an application to the Director of the Consumer Protection and Enforcement Division (CPED) in the form of a Tier 3 Advice Letter.⁶ At any point following this initial approval, a Carrier that then wishes to change its operations in a way that would “materially affect the approaches” in its PSP must submit a revised PSP in the form of a Tier 2 advice letter.⁷ Per GO 96-B, Tier 2 advice letters are appropriately disposed of by Commission staff “where statutes or Commission orders have required the action proposed in the advice letter, or have authorized the action with sufficient specificity, that [staff] need only determine as a technical matter whether the proposed action is within the scope of what has already been authorized by statutes or Commission orders.”

On December 12, 2022, Waymo submitted Waymo-0001, a Tier 3 advice letter seeking authorization to offer Driverless Deployment service within its DMV-approved ODD. At that time, Waymo’s ODD included San Francisco and portions of San Mateo County. On August 10, 2023, the Commission approved Waymo’s advice letter, finding that Waymo demonstrated it had met the requirements set out in the Deployment Decision for Driverless Deployment service.⁸

On January 11, 2024, the DMV approved an expanded ODD for Waymo that authorized Waymo to deploy driverless AVs in portions of the Los Angeles area and additional portions of the San Francisco Peninsula. On January 19, 2024, Waymo submitted Waymo-0002, a Tier 2 advice letter seeking approval of its revised PSP in connection with this expanded ODD for AV deployment. On March 1, 2024, CPED approved Waymo’s advice letter, finding Waymo complied with the requirements of the Deployment Decision. Following requests for review of staff’s disposition by several protestants, the Commission affirmed staff’s approval via Resolution TL-19150, which was adopted by the Commission on June 20, 2024.

On March 17, 2025, the DMV approved an expanded ODD for Waymo that authorizes Waymo to deploy driverless AVs in additional portions of the San Francisco Bay Area Peninsula, including the City of San José. On March 26, 2025, Waymo submitted Waymo-0003, a Tier 2 advice letter seeking approval of its revised PSP in connection with Waymo’s expanded ODD

⁵ D.20-11-046, p. 83 (as modified by D.21-05-017), OP 8.

⁶ *Id.*, OP 11.

⁷ D.20-11-046, p. 83 (as modified by D.21-05-017), OP 20.

⁸ Res. TL-19144, *Resolution Approving Waymo LLC’s Application for Phase I Driverless Autonomous Vehicle Passenger Deployment Program* (as modified by D.23-11-053).

for AV deployment. On May 19, 2025, CPED approved Waymo's advice letter, finding Waymo complied with the requirements of the Deployment Decision.

On November 21, 2025, the DMV approved an amendment to Waymo's Deployment authorization expanding the geographic ODD to additional portions of Northern and Southern California and authorizing deployment of the Ojai vehicle platform. On January 28, 2026, Waymo submitted Advice Letter 0004, a Tier 2 advice letter seeking approval of its revised PSP in connection with the amended DMV authorization.

On May 1, 2026, CPED staff requested further information from Waymo to supplement Advice Letter 0004, submitted as supplemental Advice Letter 0004-A. The purpose of this supplement was to gather additional information on preventing unaccompanied minor riders and procedures related to rider safety during operational disruptions. In Advice Letter 0004-A, Waymo described its procedures for preventing unaccompanied minors from riding in their AVs, including account onboarding age requirements, in-vehicle detection and intervention, and Terms of Service enforcement as well as its procedures for when an unaccompanied minor rider is identified. Waymo also described its procedures for protecting rider and public safety during major operational disruption incidents, including its incident response teams, operational mitigations, and rider communications. Following receipt of Advice Letter 0004-A on May 15, 2026, CPED staff authorized a shortened protest period of 10 days, with protests due by May 28, 2026. CPED received eight responses and no protests following the shortened protest period.

Protests, Responses, and Replies

GO 96-B provides that any person (including individuals, groups, or organizations) may protest or respond to an advice letter within 20 days of its submittal. Protests and responses to Waymo's advice letter were due on February 17, 2026. CPED received two protests that expressed concerns regarding or otherwise opposed Waymo's advice letter and 29 responses in support of Waymo's proposed expansion.

Responses in Support

Responses in support were submitted by 29 organizations or individuals, including disability advocates, community organizations, economic development organizations, elected officials, and transportation advocates.

Responses in support were received from (in alphabetical order):

- 3 Feet Please
- 100 Black Men of the Bay Area
- Advance SF
- Bay Area Council
- California State Assemblymember Josh Hoover
- California Bicycle Coalition
- Foundation Fighting Blindness
- Golden Gate Restaurant Association

- Homeboy Industries
- Hotel Council of San Francisco
- Integrated Community Collaborative
- LightHouse for the Blind and Visually Impaired
- Los Altos Mountain View Community Foundation
- Mothers Against Drunk Driving
- National Federation of the Blind of California
- Sacramento Metropolitan Chamber of Commerce
- San Diego Regional Chamber of Commerce
- San Francisco Chamber of Commerce
- San Jose Chamber of Commerce
- San Jose Downtown Association
- San Mateo County Economic Development Association
- Silicon Valley Bicycle Coalition
- Silicon Valley Leadership Group
- TEC Leimert
- The Richmond Neighborhood Center
- The Women's Building
- United Way Bay Area
- Valley Industry and Commerce Association
- Veloz

These responses generally highlighted the potential safety, accessibility, economic, and environmental benefits of an expansion of Waymo's driverless AV service, including its potential to reduce traffic collisions, fatalities, and incidents of impaired or reckless driving. Many responses also described Waymo's engagement with the community and highlighted potential benefits for specific populations, including people with disabilities, seniors, bicyclists, and other underserved groups such as lower-income people, youth and families, women, and people experiencing homelessness.

Protests

Protests were submitted by two organizations, including:

- San Diego Metropolitan Transit System (MTS)
- San Diego Metropolitan Transit System (MTS) Taxicab Advisory Committee

The San Diego Metropolitan Transit System (MTS), through CEO Sharon Cooney and pursuant to MTS Board Resolution No. 26-01, raised three concerns. First, it expressed concern that Waymo vehicles could shut down and/or block streets or trolley tracks and disrupt its bus, trolley, and paratransit service, pointing to the December 2025 San Francisco power outage as an example. Second, because MTS regulates taxicabs, it argued that Waymo will harm the taxi industry. Finally, MTS contended that local governments have no authority over where AVs operate, and that cities and counties should have a say in whether autonomous vehicle passenger service comes to their communities.

The San Diego Metropolitan Transit System Taxicab Advisory Committee argued that autonomous vehicle passenger service will hurt jobs, small business operators, and the long-term viability of the San Diego taxicab industry. The Committee also pointed to the regulatory gap between taxicabs, which face local and regional oversight, and transportation network companies (TNCs), which they argue face less oversight, and argued that adding “autonomous TNC service” without local regulation would widen that gap and cost more drivers their jobs.⁹ The Committee asked that the CPUC deny Waymo’s Advice Letter 0004.

Waymo’s Reply

On February 24, 2026, Waymo submitted its reply to these letters of support and opposition. In its reply, Waymo argued that it has followed the requirements of the Deployment Decision and that its advice letter be appropriately disposed of by CPED. Waymo states that San Diego MTS and the San Diego MTS Taxicab Advisory Committee failed to state a valid basis for protest under GO 96-B, and that the issues they raise represent impermissible attempts to relitigate issues already decided by the Commission or are outside the scope of the advice letter process. Waymo notes that neither party contests the completeness of its application or the adequacy of its updated PSP, and that both instead raised policy concerns about autonomous vehicle deployment in San Diego that fall outside the permissible grounds for protest under GO 96-B Section 7.4.2. Waymo further argued that the call for local control is a policy proposal the Commission already considered and rejected in the Deployment Decision, where it declined to give municipalities veto power over AV passenger service that would create a patchwork of local regulations. On that basis, Waymo asserted that Advice Letter 0004 should be approved as compliant with the Deployment Decision.

Supplemental Advice Letter

On May 15, 2026, Waymo submitted supplemental Advice Letter 0004-A. On May 18, 2026, CPED noticed a shortened protest period ending May 28, 2026. CPED received eight responses describing continued support for Waymo’s proposed expansion. No protests were received.

Responses in support were submitted by (in alphabetical order):

- California Bicycle Coalition
- LightHouse for the Blind and Visually Impaired, San Francisco
- Mothers Against Drunk Driving
- National Federation of the Blind of California, San Diego Chapter
- San Diego Seniors Community Foundation
- Street Racing Kills
- The Richmond Neighborhood Center

⁹ The San Diego Metropolitan Transit System Taxicab Advisory Committee used the term “TNC” in its protest. AV passenger service is not classified as a TNC under the Commission’s regulations. The Commission authorizes AV service through the charter-party carrier framework and the AV programs established in D.20-11-046, as modified by D.21-05-017, are distinct from the TNC category established in D.13-09-045.

- U.S. Representative Young Kim

These responses generally highlighted the potential safety, accessibility, and mobility benefits of an expansion of Waymo's driverless AV service. Several responses emphasized the potential for AVs to reduce traffic collisions, fatalities, and incidents of impaired or reckless driving, and to expand transportation access for people with disabilities, seniors, and bicyclists.

Discussion

Rule 7.4.2 of GO 96-B describes acceptable grounds for protest of an advice letter. These include: (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 (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. Protests may not rely on policy objections where the relief requested in the advice letter follows rules or directions established by statute or Commission order.

CPED has carefully evaluated the protests from San Diego MTS and MTS Taxicab Advisory Committee. Staff determined that the submissions do not state proper grounds for protest per the directives of Rule 7.4.2 of GO 96-B, as further discussed below.

San Diego MTS and the San Diego MTS Taxicab Advisory Committee raised concerns regarding Waymo's requested relief. San Diego MTS argued that Waymo's operations could disrupt the safe operation of its bus, trolley, and paratransit service, that Waymo's service will reduce demand for taxicabs, and that local jurisdictions should have a say in whether autonomous vehicle passenger service operates in their communities. The San Diego MTS Taxicab Advisory Committee argued that autonomous vehicle passenger service will negatively impact employment, small business operators, and the long-term viability of the taxicab industry in San Diego. Moreover, they argued that the regulatory disparity between taxicabs and TNCs will be intensified by the introduction of autonomous TNC service without local regulation.

These arguments seek to relitigate the Commission's orders in the Deployment Decision and are not grounds to protest the advice letter. Staff's evaluation and disposition is limited to whether the updated PSP complies with the Deployment Decision's requirements in connection with Waymo's expanded ODD for deployment operations approved by the DMV on November 21, 2025. Here, San Diego MTS and the San Diego MTS Taxicab Advisory Committee raise arguments that are outside the scope of staff's delegated authority.¹⁰ Issues related to the

¹⁰ San Diego MTS and the San Diego MTS Taxicab Advisory Committee also reiterate arguments made in previous advice letter responses that have already been evaluated by the Commission and found to be policy-based objections inappropriate for the advice letter process. See Res. [TL-19144](#) and Res. [TL-19145](#).

competitive impact of autonomous vehicle passenger service on the taxicab industry and the topic of local control over AV operations are matters of broader AV policy and are not appropriately addressed through this advice letter. Issues specifically on the ability of the autonomous vehicle to operate safely on public roads are within the purview of the DMV, which per statute is the agency responsible for oversight of those areas. Policy issues related to the Commission's authority over AV passenger service should be taken up through the Commission's rulemaking process, the appropriate venue for development of broader policy that would impact all regulated entities. AV policy matters are currently addressed in Rulemaking 25-08-013.

Disposition of Waymo's Advice Letter

As required by the Deployment Decision and Resolution TL-19137, Waymo submitted an updated PSP in connection with expansion of its ODD to additional portions of Northern and Southern California and the addition of the Ojai vehicle platform to Driverless Deployment passenger service. The PSP describes Waymo's policies and procedures to minimize risk for all passengers in driverless vehicles. These include education of passengers and the public, in-vehicle safety and accessibility features, vehicle identification features and pickup and drop-off protocols, protocols for responding to adverse events both within and outside the vehicle, and protocols for communicating with and supporting passengers.

Waymo's updated PSP includes discussion of new vehicle features and service enhancements that support the safety of passengers and the public. These include functionality such as allowing riders to make real-time adjustments to pickup and drop-off locations, initiate honking of the vehicle's horn to help identify and find their way to their vehicle, and an in-car screen prompt that allows a rider to indicate an urgent need for support. The updated PSP also describes how Waymo has incorporated its passenger safety approach into the new Ojai vehicle platform. In its discussion of responding to adverse events, Waymo describes new Rider Support tooling that allows agents to arrange a replacement Waymo ride when a trip is interrupted, updated information regarding its first responder training and engagement, and the work of its Resilience and Incident Management team. The updated PSP also discusses Waymo's continued requirement that California account holders be at least 18 years of age and its policy for violations of its terms of service.

To further develop the record on these latter two areas, on May 1, 2026, CPED requested additional information from Waymo regarding its procedures for preventing unaccompanied minors from riding in Waymo AVs and its procedures related to rider safety during operational disruptions. Waymo responded on May 15, 2026, with supplemental Advice Letter 0004-A. In this Letter, Waymo described its account onboarding age requirements, in-vehicle detection and intervention measures, and Terms of Service enforcement measures related to unaccompanied minors as well as its procedures for when an unaccompanied minor rider is identified. Waymo also described its incident response teams, operational mitigations, and rider communication practices during major operational disruptions. After reviewing this supplemental information, CPED finds it responsive to its request for additional information on the prevention of unaccompanied minor riders and rider safety during operational disruptions.

CPED finds that Waymo has complied with the requirements of the Deployment Decision. Its updated PSP is complete relative to the requirements described in the Deployment Decision. Therefore, CPED approves Waymo's updated PSP and authorizes expansion of Waymo's Driverless Deployment service as requested. Waymo may begin fared driverless passenger service operations in the specified areas and with the Ojai vehicle platform, effective today.