

May 8, 2026

CPUC Consumer Protection and Enforcement Division
Attention: Transportation Licensing and Analysis Branch
Via email to: CleanMiles@cpuc.ca.gov

SUBJECT: Reply of Center for Sustainable Energy® (CSE) to Response to CSE Advice Letter 1A: Proposed Drivers Assistance Program Implementation Plan and Handbook Pursuant to California Public Utilities Commission Decision 24-03-001

INTRODUCTION

Center for Sustainable Energy® (CSE), the Program Administrator (PA) of the Drivers Assistance Program (DAP), submits this Reply to the Response submitted by Uber on May 1, 2026,¹ to Supplemental Advice Letter (AL) 1A, submitted by CSE on March 27, 2026.²

CSE AL 1A included an updated proposed DAP Program Implementation Plan (PIP or Implementation Plan) and Program Handbook (Handbook), as requested by California Public Utilities Commission (CPUC or Commission) Consumer Protection and Enforcement Division (CPED) Staff. AL 1A and the updated proposed Implementation Plan and Handbook outlined details on several elements of the Clean Miles Standard (CMS) program and the DAP, including proposed incentive levels, incentive calculation methodologies, eligibility requirements, and eligibility verification processes. In response to the submittal of AL 1A, one party (Uber) submitted a Response, in summation:

- Uber expresses concern with the proposed value of the Upfront Purchase Incentive and suggests a lower incentive that can enable a wider pool of drivers to transition to a zero-emission vehicle (ZEV). Uber also expresses concern with the cost estimates for used vehicles, claiming that the assumptions in CSE's methodology are not supported by substantial evidence. Additionally, Uber highlights the need for clear processes and safeguards to ensure that drivers who receive DAP incentives meet the proposed ZEV retention requirement of 36 months. Uber further recommends that the process for

¹ *Uber Technologies, Inc.'s Response to Center for Sustainable Energy's Advice Letter 1A Proposing DAP Implementation Plan and Handbook* (Uber Response), May 1, 2026.

² CSE AL 1A, *Supplemental: Tier 3 Advice Letter: Proposed Drivers Assistance Program Implementation Plan and Handbook Pursuant to California Public Utilities Commission Decision 24-03-001*, March 27, 2026.

verifying the proposed ZEV retention requirement be separate from the application process for the Ongoing Charging Incentive.

CSE appreciates Uber's feedback; however, many of the concerns raised in Uber's Response to AL 1A are similar or identical to the concerns raised in Uber's Response to AL 1, submitted on December 11, 2025, which have been previously addressed in CSE's Reply to Protests and Responses to AL 1, submitted on December 18, 2025. Moreover, pursuant to GO 96-B, General Rule 7.5.1, new protests shall be limited to the substance of the supplemental or additional information. Thus, Uber's Response should be disregarded, and CSE AL 1A should be approved as submitted. Nevertheless, pursuant to GO 96-B, General Rule 7.4.3, CSE hereby replies to Uber's Response to CSE AL 1A.

DISCUSSION

The proposed incentive amounts outlined in CSE AL 1A were developed using the Commission's incentive calculation methodology and are appropriate given recent market developments.

In its Response, Uber expresses concern with the proposed Upfront Purchase Incentive amounts and claims that the amounts are arbitrarily high. Uber highlights that the incentives available under the Ride Clean Mass program (which is funded by the Massachusetts Clean Energy Center and implemented by CALSTART with assistance from CSE) were recently increased but still remain well below the proposed DAP incentives. Uber believes the proposed Upfront Purchase Incentive amounts should be lowered to help "...maximize the limited pool of DAP funds so that more drivers are converted to ZEVs."³

CSE appreciates Uber's concern with the proposed Upfront Purchase Incentive amounts. Nevertheless, CSE reiterates that Decision (D.)24-03-001 established the incentive calculation methodology based on a cost gap analysis between a ZEV and an internal combustion engine (ICE) vehicle, as outlined in Attachment B of D.24-03-001. D.24-03-001 also directed the PA to use the Commission's methodology to establish the initial incentive amounts and update the underlying assumptions, if needed. Pursuant to this direction, CSE proposed initial Upfront Purchase Incentives of \$20,300 for New ZEVs and \$14,200 for Used ZEVs.

CSE recognizes that these proposed incentive values are higher than the initial estimates included in Attachment B of D.24-03-001; however, as discussed in CSE's Reply to Protests and Responses to CSE AL 1, the elimination of state and federal EV incentives and tax credits has significantly increased the cost gap between a ZEV and an ICE vehicle, resulting in incentive amounts that are higher than the Commission's initial estimates. Accordingly, CSE contends that the proposed incentive levels are not arbitrarily high but rather are consistent with the Commission's goal to offset the cost difference between a ZEV and an ICE vehicle. For this reason, CSE maintains that the proposed incentive levels are appropriate.

³ Uber Response at 2.

Uber is correct that the incentives available under the Ride Clean Mass program are lower than the proposed DAP incentives; however, there are several notable differences between the two programs. First, the Ride Clean Mass program does not direct the PA to establish incentive levels based on the cost difference between ZEV and ICE vehicles. Second, unlike California, Massachusetts still offers statewide ZEV incentives through the Massachusetts Offers Rebates for Electric Vehicles (MOR-EV) program. Third, the Ride Clean Mass program has a lower eligibility threshold for drivers to qualify for incentives. In Ride Clean Mass, Transportation Network Company (TNC) drivers are required to complete 300 trips or drive 1,500 miles per quarter, in any two of the previous four quarters, to qualify for incentives. This requirement is significantly lower than the DAP requirement for drivers to complete 4,500 trips in the previous 12-month period to qualify for incentives. Finally, the Ride Clean Mass program is not limited to income-qualified drivers. For these reasons, CSE affirms that a direct comparison of incentive values across the two programs is not appropriate.

CSE recognizes Uber's belief that lower incentive amounts could increase the number of drivers that transition to ZEVs. As discussed previously in CSE's Reply to Protests and Responses to CSE AL 1, CSE does not have the authority to lower incentive values because doing so would contradict the Commission's direction in D.24-03-001 to establish incentive levels based on the Commission's methodology. Moreover, it is not evident that lowering incentive levels would increase the number of drivers that transition to ZEVs, as there is limited data on how many drivers would be eligible for DAP incentives and how many of those drivers would be interested in applying for DAP incentives.

CSE reiterates that D.24-03-001 directed the PA to propose updated incentive levels and assumptions through an annual Tier 2 Advice Letter. CSE suggests that this process would provide an opportunity to revise incentive levels based on DAP participation data or future market developments, if necessary.

The proposed used vehicle cost estimates incorporate the best available market data.

Uber expresses concern with CSE's used vehicle cost estimates, including the use of IHS data and the methodology to update the vehicle cost assumptions. Specifically, Uber states that the average low- and moderate-income (LMI) driver will make different decisions than high-mileage LMI drivers, who may purchase newer vehicles. Uber states that "...more than two-thirds of drivers who would meet DAP trip eligibility requirements use vehicles with model years 2020 or newer..."⁴ Uber also states that "[i]f the intent was to account for driver purchase behavior, the analysis should have incorporated real-world behavior of eligible drivers based on TNC data."⁵ Uber also expresses concern with CSE's analysis, which only considers four-passenger vehicles rather than larger vehicles.

As previously discussed in CSE's Reply to Protests and Responses to CSE AL 1, the use of the IHS data is appropriate to estimate the behavior of high-mileage LMI drivers on TNC platforms, given the lack of publicly-available data on TNC drivers and this specific subset of TNC drivers. CSE appreciates Uber's finding regarding vehicle age preferences and generally

⁴ Uber Response at 3.

⁵ *Id.*

agrees with the recommendation to incorporate TNC data; however, Uber does not cite a source to validate this finding or otherwise identify any publicly available TNC data sources that characterize the real-world behavior of high-mileage LMI drivers. CSE reiterates that, in the absence of superior data sources, the IHS data is an appropriate proxy for the intended DAP incentive recipients. CSE also notes that, in AL 1A, CSE provided multiple scenarios in which incentive amounts were calculated without the IHS dataset, with the IHS dataset without income filtration, and with the IHS dataset with income filtration to 400% of the Federal Poverty Level (FPL). Each of these scenarios yielded relatively similar incentive amounts, highlighting that the use of the IHS dataset and the decision to filter by income resulted in marginal differences in the proposed incentive amounts. CSE appreciates Uber's concern that only four-passenger vehicles were included in the analysis, rather than larger vehicles. CSE contends that the approach to use four-passenger vehicle models in the analysis is consistent with the Commission's approach in Attachment B of D.24-03-001, which also used four-passenger vehicle models to estimate the cost difference between a ZEV and an ICE vehicle.

The proposed ZEV retention requirements have been clearly outlined in the Implementation Plan and Handbook, will be reiterated in the Terms and Conditions, and do not require additional enforcement measures.

Uber reiterates its concerns that the proposed 36-month ZEV retention requirement would only be verified for drivers that apply for the Ongoing Charging Incentive. Uber recommends that all drivers who receive a DAP incentive be required to verify that they are complying with the proposed ZEV retention requirement.

As previously discussed in CSE's Reply to Protests and Responses to CSE AL 1, CSE has already detailed the proposed 36-month ZEV retention requirement within the Implementation Plan and Handbook, which specify that vehicle resale is prohibited within the 36-month period and could result in incentive repayment. Furthermore, CSE intends to include this requirement in the forthcoming Terms and Conditions. CSE notes that this approach is consistent with the ZEV retention requirements for the Ride Clean Mass program and the Clean Vehicle Rebate Project (CVRP). Additionally, as noted before, CSE has discussed this issue with CPED Staff, who did not specify the need for additional enforcement mechanisms beyond CSE's proposal. For these reasons, CSE contends that no additional enforcement mechanisms are necessary to implement the proposed ZEV retention requirement.

The process for verifying eligibility for the Ongoing Charging Incentive has been designed to be as streamlined as possible and would not be improved by developing a separate process to verify the proposed ZEV retention requirement, as this would increase administrative complexity.

Uber supports a streamlined application process for the Ongoing Charging Incentive and supports the proposal for incentive recipients to verify income eligibility once, rather than re-verifying eligibility each year. Uber recommends the verification of the proposed ZEV retention requirement be separated from the application process for the Ongoing Charging Incentive. Uber argues that this separation will ensure that all incentive recipients (not just those applying

for the Ongoing Charging Incentive) verify ongoing ownership and will simplify the application process for the Ongoing Charging Incentive.

CSE agrees with Uber's desire to streamline the application process for the Ongoing Charging Incentive and appreciates Uber's support of the proposal for incentive recipients to verify income eligibility once, rather than re-verifying eligibility each year. For several reasons, CSE respectfully disagrees with Uber's recommendation to separate the proposed ZEV retention requirement verification from the application process for the Ongoing Charging Incentive. First, the proposed ZEV retention requirement is a key eligibility criterion for the Ongoing Charging Incentive. Separating out these eligibility verification processes would increase administrative complexity rather than streamline the application process. Second, as noted above, CSE contends that no additional enforcement mechanisms are necessary to implement the proposed ZEV retention requirement. Third, the application process for the Ongoing Charging Incentive has already been developed in coordination with CPED Staff and has been detailed in the Implementation Plan and Handbook. Revising this application process at this late stage of the program design process would delay the DAP launch and would not yield any benefits to DAP participants. Moreover, as discussed in CSE's Reply to Protests and Responses to CSE AL 1, CSE has sought to address CMS Regulated Entities' concerns regarding the data exchange processes and will continue to engage with CMS Regulated Entities in implementing the DAP in accordance with D.24-03-001 and direction from CPED Staff. For these reasons, CSE contends that the application process for the Ongoing Charging Incentive should be maintained as proposed in the Updated Implementation Plan and Handbook.

CONCLUSION

CSE submitted CSE AL 1A, the Supplemental Tier 3 Advice Letter to update the proposed DAP Implementation Plan and Handbook, in accordance with direction from CPED Staff. Uber's Response should be disregarded, and CSE AL 1A should be approved as submitted.



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Service List R.21-11-014

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Implement Senate Bill 1014- the
California Clean Miles Standard
Program.

RULEMAKING 21-11-014
(Filed November 18, 2021)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this *Reply to Response to CSE Advice Letter 1A* on all known parties of record in this proceeding by delivering a copy via email to the current service list for R.21-11-014.

Executed on May 8, 2026, in San Diego, CA.



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