

September 8, 2022 Lyft Inc. Advice Letter No. WAV-0010B Supplemental

California Public Utilities Commission Consumer Protection and Protection Division Transportation Licensing and Analysis Branch 505 Van Ness Avenue San Francisco, CA 94102

Pursuant to Decision (D.) 20-03-007, Lyft, Inc. submits this Advice Letter No.WAV-0010B Supplement to request to offset, against the quarterly Access Fund payments due, the amounts spent by Lyft, Inc. to improve wheelchair accessible vehicle (WAV) service in Quarter 4 of 2021. The requested effective date is February 14, 2022 (30 days from date of original filing).

Please note this cover letter is being resubmitted to correct an error that was present in Table A of the cover letter submitted by Lyft on August 12, 2022. Specifically Table A has been amended to reflect minutes for Q4 Level 1 and Level 2 for Los Angeles County rather than percentages. No other changes have been made.

The offset amounts requested by county is as follows:

County	Offset Requested (\$)
Los Angeles	<b>\$</b> 700,921.12

**Subtotal** \$700,921.12

**Total Offset Request** \$700,921.12

Per D.20-03-007, Lyft, Inc provides the following documents in support of its request as indicated in the summary table below (including all counties for which the TNC seeks offsets):

- 1. Number of WAVs In Operation
- 2. Number and Percentage of WAV Trips
- 3. Completed WAV Trip Request Response Times
- 4. OTS Report
- 5. Exemption Response Times<sup>1</sup>
- 6. Outreach
- 7. Training and Inspections
- 8. Accounting of Funds Expended
- 9. Complaints
- 10. Contract Information

<sup>&</sup>lt;sup>1</sup> Lyft's "Exemption Response Time" data sheet is intentionally left blank. Lyft does not have any exemptions under this report.



The documents referenced above reflect the following changes that were not included in Lyft's original submission:

- Previously, Lyft's data sets for its Q4 2021 offset request included WAV trips originating outside Los Angeles and San Francisco Counties. These trips have been removed from the data sets.
- Lyft's Funds Expended report includes an updated "Transportation Service Partner Fees / Incentives and/ or Management Fees" value for Los Angeles county. In Lyft's previous request, the value for this field was based on estimates of our third party contractor invoices that Lyft had yet to receive. The value for this field in this submission reflects the actual amount invoiced.
- All pre-scheduled trips have been removed from the data sets.
- Lyft has specified, per the CPUC data dictionary instructions, whether Lyft has any WAVs in operation for a given hour or if the time period is outside of Lyft's WAV operating hours.
- "Unique trips" reflects the total number of unique WAV trips requested across completed trips, not accepted trips, and canceled trips.
- For Response Times, Lyft has included 25th and 75th percentile in addition to each decile.
- Lyft has added information regarding outreach Lyft had performed at the Bay Area Disability Entrepreneurship Week in Q4 2021.

Criteria	Must Demonstrate	Satisfied Requirements (Y/N)
1. Presence and availability of WAVs	(a) the number of WAVs in operation - by quarter and aggregated by hour of the day and day of the week, and (b) the number and percentage of WAV trips completed, not accepted, canceled by passenger, canceled due to passenger no-show, and canceled by driver — by quarter and aggregated by hour of the day and day of the week (c) operating hours for each geographic area	Y
2. Improved level of service	(a.1) WAV Response Times: Either the Level 1 (50%) or Level 2 (75%) had a response time within the response time standard (see Table A) (a.2) Offset Time Standard: Either the Level 1 (50%) or Level 2 (75%) Offset Time Standard for a quarter in a geographic area, and demonstrated improvement over the prior quarter's performance (see Table B) (b) Trip Completion Standard: Increase in the total number or % of completed WAV trips requested compared to previous quarter (see Table C)	Y



3. Efforts to publicize and promote available WAV services	Evidence of outreach efforts such as a list of partners from disability communities, how the partnership promoted WAV services, and marketing or promotional materials of those activities	Y
4. Full accounting of funds expended	Qualifying offset expenses are: (a) reasonable, legitimate costs that improve a TNC's WAV service, and (b) incurred in the quarter for which a TNC requests an offset, and (c) on the list of eligible expenses attached as Appendix A	Υ
5. Training and inspections	<ul> <li>(a) certification of WAV driver training completion within the past 3 years,</li> <li>(2) WAV driver training programs used per geographic area, and the number of WAV drivers that completed WAV training in that quarter, and</li> <li>(3) Certification of WAV inspection and approval</li> </ul>	Υ
6. Reporting complaints	(a) number of complaints related to WAV drivers or services – by quarter and geographic area, and broken out by category	Υ

Table A: Level 1 and 2 Response Times by County (minutes)

County	Bench	Benchmark Q4 2021			Within	
	Level 1 (mins)	Level 2 (mins)	Level 1 (mins)	Level 2 (mins)	Benchmark?	
Los Angeles	25	50	23.54	32.61	Yes	

Table B: Level 1 and Level 2 Offset Time Standards by County (percent)

County	Q3 2021		Q4 2021		Demonstrates
	Level 1 (%)	Level 2 (%)	Level 1 (%)	Level 2 (%)	Improvement?
Los Angeles	53.57%	95.68%	54.61%	96.04%	Yes



Table C: Trip Completion Standard

County	Option 1 or 2	(1) # of completed trips previous quarter	(2) % of trip requests that were completed previous quarter	(1) # of completed trips this quarter	(2) % of trip requests that were completed this quarter
Los Angeles	1	2847	61.13%	3285	64.37%

In compliance with General Order 96-B, we served a copy of this advice letter supplement via email upon the parties identified on the attached R.19-02-012 service list on September 8, 2022. If there are any questions regarding this advice letter, please contact Janeé Weaver at <a href="mailto:jweaver@lyft.com">jweaver@lyft.com</a>.

Any Party can protest or respond to this advice letter by sending a written protest or response via email to CPED at TNCAccess@cpuc.ca.gov. If submitting a protest, the protest must set forth the specific grounds on which it is based, including supporting information or legal arguments. A protest or response to the advice letter must be submitted to CPED within twenty (20) days of the date the advice letter was filed and must be served on the TNC on the same day.

Email a copy of the protest or response to this advice letter to Janeé Weaver at jweaver@lyft.com.

To obtain information about the CPUC's procedures for advice letters and protests, visit CPUC's website at <a href="https://www.cpuc.ca.gov">www.cpuc.ca.gov</a> and look for links to General Order 96-B.

I HEREBY CERTIFY UNDER THE PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOLLOWING ATTACHMENTS HAVE BEEN EXAMINED BY ME AND IS TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Yours truly,

Janeé Weaver

Counsel, Regulatory Compliance

Janes Weaver

Lyft



## Attachments:

- 1. 0032513 Lyft AL10A Supplemental Data Number of WAVs In Operation AL10A Supplemental
- 2. 0032513 Lyft AL10A Supplemental Data WAV Trips AL10A Supplemental
- 3. 0032513 Lyft AL10A Supplemental Data Response Times AL10A Supplemental
- 4. 0032513 Lyft AL10A Supplemental Data OTS Report AL10A Supplemental
- 5. 0032513 Lyft AL10A Supplemental Data TCS Report AL10A Supplemental
- 6. 0032513 Lyft AL10A Supplemental Data Exemption Response Times AL10A Supplemental
- 7. 0032513 Lyft AL10A Supplemental Data Outreach AL10A Supplemental
- 8. 0032513 Lyft AL10A Supplemental Data Training and Inspections AL10A Supplemental
- 9. 0032513 Lyft AL10A Supplemental Data Funds Expended AL10A Supplemental
- 10. 0032513 Lyft AL10A Supplemental Data Complaints AL10A Supplemental
- 11. 0032513 Lyft AL10A Supplemental Data Contract Information AL10A Supplemental