

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



FILED
02/16/22
12:28 PM

ASSISTANT CHIEF ADMINISTRATIVE LAW JUDGE
W. ANTHONY COLBERT and
ADMINISTRATIVE LAW JUDGE STEPHANIE WANG, co-presiding
COMMISSIONER GENEVIEVE SHIROMA, in attendance

)	PREHEARING
)	CONFERENCE
Order Instituting Rulemaking to)	
Implement Senate Bill 1014-the)	
California Clean Miles Standard)	
Program.)	
)	Rulemaking
)	21-11-014
)	
)	

REPORTER'S TRANSCRIPT
Virtual Proceeding
February 11, 2022
Pages 1 - 51
Volume 1

Reported by: Karly Powers, CSR No. 13991
Andrea L. Ross, CSR No. 7896

VIRTUAL PROCEEDING

FEBRUARY 11, 2022 - 10:39 A.M.

* * * * *

ADMINISTRATIVE LAW JUDGE WANG: Let's
go on the record.

It is February 11, 2022. This is
the remote prehearing conference for
Rulemaking 21-11-014 to Implement the
California Clean Miles Standard Program.

I am Stephanie Wang, the
Administrative Law Judge assigned to this
proceeding. Commissioner Genevieve Shiroma
is the assigned Commissioner.

Commissioner Shiroma, would you like
to make a statement today?

COMMISSIONER SHIROMA: Yes. Thank you.

Good morning, everyone. My name is
Genevieve Shiroma and I am the assigned
Commissioner for this proceeding. My
pronouns are she/her.

I am pleased to join you for this
prehearing conference on the Clean Miles
Standard. The Clean Miles Standard was
established, as everyone knows, in 2018 by
Senate Bill 1014 with the purpose of reducing
the greenhouse gas emissions from
transportation network companies.

The California Air Resources Board

1 adopted targets and goals for this program
2 last year. And now, by statute, it is our
3 responsibility to implement the program.

4 The key feature is to ensure that
5 this effort does not harm low- and
6 moderate-income drivers and increases clean
7 mobility options for low- and moderate-income
8 individuals. These goals are consistent with
9 the Commission's Environmental and Social
10 Justice Action Plan.

11 I would like to thank our assigned
12 judge, Judge Stephanie Wang, and today's
13 court reporters Andrea Ross and Karly Powers.
14 I look forward to today's PHC.

15 Back to you, Judge.

16 ALJ WANG: Thank you, Commissioner.

17 The purpose of this prehearing
18 conference is to discuss the issues and
19 scope, schedule, and procedural matters.
20 These matters will be determined by the
21 assigned Commissioner in an upcoming scoping
22 memo.

23 Our agenda today is as follows:
24 First, we will discuss the service list and
25 take appearances; second, we will discuss the
26 issues in scope and categorization of the
27 proceeding; third, we will discuss the
28 proceeding schedule and need for hearings.

1 On to the service list and
2 appearances. In Commission proceedings,
3 respondents to the Order Instituting
4 Rulemaking and any person who files comments
5 on the Order Instituting Rulemaking are
6 automatically made parties to the proceeding
7 and do not need to take further action.

8 Members of the public who have not
9 filed comments on the Order Instituting
10 Rulemaking may make a motion for party
11 status. For those who want to stay informed
12 but do not intend to file comments, please
13 join the service list on an information-only
14 basis, not as a party.

15 Now I will take appearances for
16 party representatives. I will call on each
17 party representative on the web conference to
18 state the name of the organization you
19 represent and state your full name.

20 Let's start with the party
21 representative for Cal Advocates.

22 MR. HODEL: Thank you, your Honor.
23 This is Drew Hodel appearing as attorney for
24 the Public Advocates Office at the California
25 Public Utilities Commission or, as you
26 stated, Cal Advocates.

27 ALJ WANG: Thank you.

28 Now the party representative for

1 Cruise.

2 MS. RAMAN: Thank you, your Honor. I
3 am Prashanthi Raman, Vice President of Global
4 Government Affairs at Cruise.

5 ALJ WANG: Thank you.

6 Party representative for Lyft.

7 MS. WEAVER: Thank you, your Honor. My
8 name is Janee Weaver. I'm regulatory counsel
9 at Lyft.

10 ALJ WANG: Thank you.

11 Party representative for San
12 Francisco Taxi Workers Alliance.

13 MR. GRUBERG: Thank you, ALJ Wang. I'm
14 Mark Gruberg for the San Francisco Taxi
15 Workers Alliance.

16 ALJ WANG: Thank you.

17 For the Joint Commenters.

18 MR. HALSO: Thank you, Judge Wang. My
19 name is Joe Halso. I'm counsel for Sierra
20 Club. I'm speaking this morning on behalf of
21 the Joint Commenters who include Sierra Club,
22 BlueGreen Alliance, Union of Concerned
23 Scientists, and Rideshare Drivers United.
24 Thank you.

25 ALJ WANG: Thank you.

26 Party representative for Uber
27 Technologies.

28 MR. PRABHAKARAN: Thank you, Judge

1 Wang. My name is Vid Prabhakaran. I am a
2 partner at Davis Wright Tremaine representing
3 Uber Technologies Incorporated. My pronouns
4 are he/him.

5 ALJ WANG: Thank you.

6 Party representative for Waymo.

7 MS. DAVIDSON: Thank you, your Honor.
8 Mari Davidson, D-a-v-i-d-s-o-n, managing
9 counsel for Waymo.

10 ALJ WANG: Thank you.

11 On to issues in scope and
12 categorization. Today's --

13 MR. HALSO: Your Honor, my apologies.
14 I think SEIU may have been missed in the
15 list.

16 ALJ WANG: Oh, thank you. One moment.
17 Yes. Thank you very much for that
18 correction.

19 Please, party representative for
20 SEIU.

21 MR. GARCIA: Thank you, your Honor.
22 Jesus Garcia with SEIU, Local 721.

23 ALJ WANG: Thank you.

24 All right. On to issues in scope
25 and categorization. Today's discussion of
26 the issues in scope will be limited to the
27 question of which issues should be included
28 in the scope of the proceeding. We will not

1 discuss how to resolve the issues in scope.
2 Please reserve your comments on substantive
3 questions for the upcoming workshop.

4 The Order Instituting Rulemaking
5 included a preliminary scope of issues.
6 Parties may comment on whether this
7 preliminary scope should be modified. The
8 Order Instituting Rulemaking also
9 preliminarily categorized this proceeding as
10 quasi-legislative because our consideration
11 of these matters would establish policies or
12 rules affecting regulated entities.

13 Parties may comment on whether this
14 categorization is appropriate for all
15 proposed issues in scope.

16 In a moment I will call on party
17 representatives to comment on the issues in
18 scope and categorization of this proceeding.
19 Before you comment, please state your name
20 and organization for the record. Please
21 comment for no more than two minutes.

22 We will start with party
23 representative for Cal Advocates.

24 MR. HODEL: Thank you, your Honor.
25 Drew Hodel on behalf of Cal Advocates.

26 With respect to the preliminary list
27 of issues for scope in this proceeding, which
28 were specified in the Order Instituting

1 Rulemaking, Cal Advocates has only one
2 comment or request and that is that one
3 overarching issue be added to this
4 proceeding, and that is whether the
5 implementation of any of the various goals of
6 this proceeding will impact ratepayers and,
7 if so, how.

8 Other than adding that overarching
9 issue, Cal Advocates has no comment or
10 objection to the originally scoped set of
11 issues in this proceeding.

12 ALJ WANG: Thank you.

13 Party representative for Cruise.

14 AC ALJ COLBERT: Sorry. I apologize,
15 Judge Wang. This is Assistant Chief Colbert.

16 ALJ WANG: Hi, Assistant Chief.

17 AC ALJ COLBERT: Hey. Good morning.

18 To the statement that was just made
19 by the Cal Advocates' representative, that
20 seems extremely broad, I mean how ratepayers
21 are impacted. What is the basis for that
22 concern and is there some more specific
23 concern that you have?

24 MR. HODEL: Thank you very much for the
25 question. This is Drew Hodel on behalf of
26 Cal Advocates.

27 I wouldn't argue that that issue
28 we'd request be added to the scope is broad,

1 but it's broad intentionally.

2 So to answer your question as to the
3 basis for our request, we understand that the
4 implementation of the goals of the Clean
5 Miles Standard, you know, for example,
6 electric vehicle miles traveled and
7 greenhouse gas targets per mile via this
8 proceeding may impact ratepayers because it's
9 not yet clear how the charging
10 infrastructure, which will be necessary to
11 lower TNC's emissions will be paid for.

12 But already several parties,
13 including Uber and FLO Services USA, have
14 indicated in their comments to the OIR that
15 investor-owned utilities and ratepayers
16 should help fund the CMS program.

17 Cal Advocates requests this issue be
18 added to the scope to ensure that any
19 coordination between this proceeding and the
20 transportation electrification proceeding be
21 efficient and that any ratepayer impacts
22 remain just and reasonable.

23 You may have asked a second
24 question, but at this point, excuse me, I've
25 forgotten what that second question was. But
26 that's the basis for our request.

27 AC ALJ COLBERT: But there is already a
28 procedure -- you mentioned a procedure in

1 process to have the charging infrastructure.

2 Is Cal Advocates' position that the
3 charging infrastructure would have to be
4 expanded and cost more than is already
5 contemplated in that proceeding as that
6 infrastructure is being expanded by the
7 Commission in that proceeding?

8 MR. HODEL: No. Our position isn't
9 that it would necessarily need to be
10 expanded. Our position is that if one of the
11 issues in this proceeding is how this
12 proceeding should be coordinated with that
13 proceeding, we'd like ratepayer impacts to be
14 taken into consideration.

15 AC ALJ COLBERT: Okay. Thank you, your
16 Honor.

17 ALJ WANG: Thank you.

18 I'm now requesting comments from
19 Cruise.

20 MS. RAMAN: Thank you, your Honor. My
21 name is Prashanthi Raman with Cruise, which
22 is a shared, autonomous, all-electric car
23 company based in San Francisco, California.

24 Cruise recommends that three items
25 should be added to the scope of the
26 proceeding to make the Clean Miles Standard
27 more market based further incentivizing
28 electric ridesharing.

1 The first item is converting the
2 Clean Miles Standard to a tradable credit and
3 incentive program allowing for
4 over-compliance credits to be purchasable by
5 deficit-generating fleets and TNCs.

6 Low Carbon Fuel Standard has been
7 extremely successful in its ability to
8 decarbonize the state's transportation fuel
9 stock. The Clean Miles Standard is
10 structured to replicate the LC impact through
11 decreasing carbon intensity targets for VMT.

12 Allowing over-compliance credits to
13 be tradable with the price driven by a market
14 could incentivize faster adoption of
15 rideshare and EVs. These funds could be used
16 to support greater fleet turnover for the
17 installation of rideshare charging
18 infrastructure.

19 The second item is allowing
20 additional crediting for enabling more public
21 charging. There has already been a shift in
22 EV infrastructure site design to co-locate
23 dedicated ride-hailing chargers with
24 publicly available chargers.

25 Ride-hailing fleets can strengthen
26 the business case for EV charging sites by
27 increasing utilization, which can help
28 support more publicly available chargers.

1 The CPUC should consider allowing
2 additional credits to be generated by
3 charging activities of non-TNC users at a
4 rideshare fleet-enabled or owned site.

5 Lastly, the Commission should
6 incentivize fully renewable fuel stock in the
7 Clean Miles Standard. While EV and FCV
8 ridesharing is inherently cleaner than
9 gas-powered ridesharing, it still generates
10 upstream emissions.

11 Incentivizing the use of renewable
12 charge and -- excuse me -- renewable energy
13 for charging and fueling could ensure that
14 every ridesharing mile driven is truly
15 emissions free.

16 Regarding whether the proceeding
17 should remain quasi-legislative, yes, this is
18 appropriate. The proceeding is inherently
19 policy focused and there is no ratesetting
20 being deliberated. Thank you.

21 ALJ WANG: Thank you.

22 Party representative for Lyft, Janee
23 Weaver, please.

24 MS. WEAVER: Thank you, your Honor. My
25 name --

26 (Crosstalk.)

27 AC ALJ COLBERT: Your Honor, again, I
28 apologize. This is Assistant Chief Colbert.

1 I had a question for Ms. Raman.

2 MS. RAMAN: Yes.

3 AC ALJ COLBERT: Ms. Raman, you said
4 for some clarification about having the
5 public use dedicated TNC charging stations or
6 have TNCs use dedicated public charging
7 stations and credit. I wasn't clear on what
8 you meant by that.

9 MS. RAMAN: Shared co-located sites is
10 what I had made my remarks upon.

11 AC ALJ COLBERT: And what would the
12 credits be?

13 MS. RAMAN: Sorry, I missed that.
14 Excuse me, the network might have adjusted.
15 Excuse me?

16 AC ALJ COLBERT: You mentioned credits.
17 If there is a co-located site and it cost
18 X amount to charge the vehicle, why would
19 there be credits for that as opposed to
20 paying for it?

21 MS. RAMAN: There are more credits for
22 public users and so that is the suggested
23 route.

24 AC ALJ COLBERT: You're saying there's
25 more credits for public users of sites now or
26 there's -- I'm still not clear. Sorry.
27 Forgive my ignorance.

28 MS. RAMAN: That's okay. I'm saying

1 for more credits for public users, so the
2 energy that is charged by the public can help
3 generate additional energy. We can also
4 follow up with written comments to clarify as
5 well in our responses if that's helpful.

6 AC ALJ COLBERT: That would be helpful.

7 Thank you, your Honor.

8 ALJ WANG: Party representative for
9 Lyft, Janee Weaver.

10 MS. WEAVER: Thank you, your Honor.
11 Janee Weaver on behalf of Lyft. Lyft does
12 not propose that any issues should be added
13 to the scope of this proceeding. Lyft
14 believes that the categorization of this
15 proceeding as quasi-legislative is
16 appropriate for all proposed issues in the
17 scope of this proceeding. Thank you.

18 ALJ WANG: Thank you.

19 Party representative for San
20 Francisco Taxi Workers Alliance, Mark
21 Gruberg.

22 MR. GRUBERG: Thank you, your Honor.

23 I want to ask the Commission to
24 expand the scope of the OIR to include the
25 issue of TNC-generated congestion.
26 Congestion is a serious environmental concern
27 in and of itself, and it's also a significant
28 contributor to vehicle emissions.

1 As we pointed out in our comments,
2 SB 1014 also counts congestion reduction
3 among its goals. Simply reducing GHGs per
4 vehicle without dealing with the sheer number
5 of TNC vehicles on the streets will not
6 achieve that end.

7 As you are aware, the numbers of
8 these vehicles are vast. San Francisco has
9 amply documented the enormous impact of TNC
10 congestion. Fully one-fourth of vehicle
11 congestion and over one-third of it in the
12 downtown area are attributable to TNCs, and
13 that was as of 2016.

14 While the severest impacts might be
15 in some degree of remission during the
16 pandemic, it will likely be back in full
17 force, and perhaps even more forcefully in
18 the not-too-distant future.

19 The Commission has exclusive
20 regulatory authority with the TNCs. You
21 cannot turn a blind eye to any of the
22 negative impacts of their operations, whether
23 it's on issues of personal safety, pollution,
24 congestion, or anything else.

25 Keep in mind that congestion and
26 pollution go hand in hand. Unless and until
27 all vehicles are emissions free, the heavier
28 the traffic, the more GHG pollution there

1 will be.

2 SB 1014 seeks to achieve the maximum
3 degree of emissions reduction possible. Even
4 if the emissions reduction goal of SB 1014 is
5 met, there will be hundreds of thousands of
6 gas burning TNC vehicles on the streets, some
7 of them commuting hundreds of miles to work.
8 That also presents a safety issue.

9 I urge you to add the issue of TNC
10 cost congestion associated issue of vehicle
11 miles traveled and the additional GHG
12 emissions it generates to this proceeding.
13 Thank you.

14 ALJ WANG: Actually, I have a question.
15 Mark Gruberg, do you believe that this is not
16 already included in the proposed preliminary
17 scoping items of Environmental and Social
18 Justice?

19 MR. GRUBERG: I did not read it as
20 such. If it is included, I am happy to hear
21 that, but I think it needs to be specifically
22 and explicitly included as an issue.

23 ALJ WANG: Thank you for the
24 clarification.

25 AC ALJ COLBERT: Your Honor, this is
26 Assistant Chief Colbert. To follow up on
27 your question for Mr. Gruberg talking about
28 congestion, is it your contention that

1 congestion would increase as this bill is
2 implemented because, as I think you noted,
3 the bill's intent is to convert TNCs to
4 zero-emission or low-emission vehicles. So
5 if there's a one-to-one swap-out, it would
6 seem that the emissions would go down.

7 Are you saying that if this is
8 implemented, the number of vehicles would go
9 up so emissions would go up?]

10 MR. GRUBERG: Well, the number of
11 vehicles has increased over time. That was
12 true until the pandemic set in. Now, we can
13 reasonably expect that will continue to
14 increase. But also those numbers, as far as
15 we're concerned, are --

16 (Webex audio glitch.)

17 MR. GRUBERG: -- unacceptable from the
18 standpoint of congestion. So you replace
19 vehicle by vehicle, and you still have the
20 same amount of congestion. And that
21 congestion will likely grow over time and --
22 if past performance is any indication. And
23 so, yes, we do expect that there will be even
24 more congestion, but that the amount of
25 congestion that we expect to have without
26 that increase would still be unacceptable.

27 AC ALJ COLBERT: So you're focusing on
28 the issue of congestion when, by definition,

1 this proceeding is focusing on the issue of
2 emissions?

3 MR. GRUBERG: Well, it's the definition
4 that I would like to see modified, because SB
5 1014 does include congestion as -- congestion
6 reduction as part of its goals. It's not the
7 main frame of it. But if you read the text,
8 congestion is mentioned in a couple of
9 places. And the Government Code provision
10 that it refers to also refers to congestion.
11 And so we think that this is a goal that the
12 Commission, in one forum or another, needs to
13 take up. And this seems to be the most apt
14 location for that discussion to take place.

15 AC ALJ COLBERT: But couldn't
16 congestion only be addressed by reduction of
17 vehicles?

18 MR. GRUBERG: Well, that is certainly
19 the most obvious way that it could be done.
20 There are other things that could be done
21 that might, you know, help in that direction.
22 For instance, these drivers who are commuting
23 hundreds of miles to come to San Francisco to
24 drive for a couple of days on the weekend and
25 driving back hundreds of miles, you know, is
26 -- there are congestion issues; there are
27 emissions issues; there are safety issues,
28 people sleeping in parking lots. So, yes,

1 there are other things that can be done. But
2 the reduction of numbers would be a principle
3 one.

4 AC ALJ COLBERT: Thank you for that
5 clarification.

6 Thank you, your Honor.

7 ALJ WANG: Party representative for
8 Joint Commenters, Joe Halso.

9 MR. HALSO: Thank you, Judge Wang.
10 Again, this is Joe Halso on behalf of the
11 Joint Commenters.

12 We do not think the list of issues
13 in the OIR needs to be expanded, nor do we
14 think any issues should be removed from the
15 list. In particular, we want to emphasize
16 that the Commission ensure that the issue of
17 enforcement remains one of equal import to
18 the others, given how critical it is to this
19 regulation.

20 We do think the Commission should
21 refine the scope of issues in two important
22 ways. So, first, as part of ensuring minimal
23 impact on low- and moderate-income drivers, I
24 think the scoping memo should specifically
25 name the option of establishing a driver
26 assistance fund that is financed by a
27 per-mile fee, as some would need some
28 transition to electric vehicles for TMC

1 drivers by supporting purchase of such
2 vehicles and related charging equipment. Our
3 comments, and those of SEIU, have more detail
4 on the driver assistance fund. And several
5 parties have expressed support or have
6 expressed interest in our proposal. Given
7 the understanding that's on the table for
8 consideration in this proceeding, we hope the
9 Commission is going to appreciate the
10 importance of naming a possible solution in
11 the scoping memo, particularly given the
12 statutory directive on -- around impact on
13 low- and moderate-income drivers.

14 And then, second, the issue of
15 optional credit programs. We ask that that
16 be defined in the scoping memo to exclude
17 discussion of crediting for eVMT targets or
18 trading of credit of any kind. We think a
19 fair understanding of optional credit
20 programs left open to the Commission excludes
21 those approaches. And this clarification
22 would avoid relitigating issues already
23 addressed in the CARB proceeding.

24 And then, finally, we would caution
25 against consolidating with the transportation
26 electrification framework and DRIVE OIR.
27 There's obviously related issues; but we do
28 not think there's overlap of the kind that

1 would warrant consolidation and are concerned
2 that would unnecessarily prolong both
3 proceedings.

4 Thank you.

5 ALJ WANG: Thank you.

6 Party representatives for Uber
7 Technologies.

8 (Crosstalk.)

9 COMMISSIONER SHIROMA: Sorry. In my
10 list it's Jesus Garcia, SEIU.

11 ALJ WANG: Oh, I am so sorry. I
12 skipped down and -- thank you so much.

13 COMMISSIONER SHIROMA: Sure. Sure.
14 Because Joe was consolidated, so it kind
15 of --

16 (Crosstalk.)

17 ALJ WANG: Yes, I apologize.

18 COMMISSIONER SHIROMA: Thank you.

19 ALJ WANG: Thank you.

20 MR. GARCIA: Thank you, your Honor. So
21 my name is Jesus Garcia, and I'm speaking on
22 behalf of SEIU Local 721.

23 To ensure that the clean mile
24 standard regulation appropriately holds TNCs
25 accountable for achieving greenhouse gas and
26 electric vehicle mile travel targets, SEIU
27 721 respectfully --

28 (Webex audio glitch.)

1 ALJ WANG: Excuse me. Let's go off the
2 record.

3 (Off the record.)

4 ALJ WANG: Let's go on the record.

5 MR. GARCIA: Thank you, your Honor.
6 Again, I'm Jesus Garcia. I'm speaking on
7 behalf of SEIU Local 721.

8 To ensure that the clean mile
9 standard regulations that hold TNCs
10 accountable for achieving greenhouse gas and
11 electric vehicle mile travel targets, SEIU
12 721 respectfully asks the California Public
13 Utility Commission (sic) to revise the
14 preliminary scope of issues to include an
15 assessment of existing and new financial
16 mechanisms that are required to ensure that
17 an equitable transition of the TNC fleet to
18 zero emission, we suggest that TNCs should be
19 required to deposit a per-mile trip in real
20 time, as trips are completed, into a fund
21 controlled and administered by the PUC.

22 Further, we encourage -- to adopt
23 regulations stipulating that any revenue
24 derived from such fees is to be used solely
25 to provide financial assistance to the TNC
26 drivers for the purchase of electric
27 vehicles, charging expenses, and other
28 infrastructure associated (inaudible.) As

1 the joint commenter, Joe Halso, mentioned,
2 the Commission should not remove
3 considerations of enforcement from the list
4 -- from the issue list.

5 We appreciate your consideration of
6 both our verbal and written comments and look
7 forward to actively engaging in this
8 proceeding. Thank you for your time.

9 ALJ WANG: Thank you.

10 I have a couple follow-up questions
11 that perhaps you will be able to answer in a
12 prehearing conference statement in more
13 detail. I'm interested in whether your
14 statement just now of what would be included
15 in the drivers assistance fund specifically
16 includes EV charging infrastructure. And, if
17 so, did you mean home EV charging
18 infrastructure; or public infrastructure; or
19 both? So that's my first question.

20 MR. GARCIA: Thank you, your Honor. It
21 would be both home and -- yeah. Yeah. Both.

22 ALJ WANG: And the second question
23 is -- that might be more appropriate to a
24 filing -- is understanding why -- and,
25 specifically, you call out that a drivers
26 assistance fund would be specifically
27 controlled and administrated by the Public
28 Utilities Commission?

1 MR. GARCIA: We submitted public
2 comments, your Honor. And we detailed more
3 in that letter the way -- regarding the
4 reasoning behind why the PUC should be
5 administering the funds versus any other
6 entities.

7 ALJ WANG: Thank you.

8 AC ALJ COLBERT: Your Honor, I also
9 have some questions, please.

10 ALJ WANG: Yes.

11 AC ALJ COLBERT: Hello, Mr. Garcia.
12 This is Assistant Chief Colbert.

13 You mentioned, and I think one of
14 the other speakers mentioned, continuing
15 having enforcement considered in this. And,
16 if you can say, what is your view of who the
17 enforcement would be against?

18 As you probably know, TNC drivers at
19 this point are considered independent
20 contractors. So there's the issue of if the
21 standards aren't met, if the EVs are not
22 purchase, if the miles are not reduced, who
23 would enforcement be against? Drivers who
24 failed to convert their gas vehicles to
25 low-emission vehicles? Or the TNCs for not
26 requiring their drivers to convert from gas
27 vehicles to lower-emission vehicles?

28 Who do you contemplate enforcement

1 would be done against?

2 MR. GARCIA: Thank you, Assistant. So,

3 --

4 (Crosstalk.)

5 MR. GARCIA: Sorry.

6 AC ALJ COLBERT: It's Assistant Chief
7 Administrative Law Judge.

8 MR. GARCIA: Assistant Chief. Sorry.
9 Sorry.

10 So when it comes to enforcement, we
11 understand that right now, obviously, because
12 of Prop 22 gave TNCs that option of re- --
13 continuing to have their drivers as
14 independent contractors, but there is this --
15 you know, there's this litigation happening
16 right now. We know that it's a fact that
17 Prop 22 is unconstitutional. And so if the
18 current employee status of TNC drivers is
19 materially altered, either by legislation,
20 regulations, judicial orders, or some other
21 similar development, both agencies, CARB and
22 the CUP (sic), must reopen their formal
23 ruling process in order to make relevant
24 adjustments to the CM -- to the clean mile
25 standard regulations, so...

26 AC ALJ COLBERT: Would you acknowledge
27 that as things stand now, however -- or it
28 could -- that the cost of enforcement and the

1 consequences could actually fall to the low-
2 and moderate-income drivers, which I assume
3 are your constituents?

4 MR. GARCIA: I believe we submitted
5 public comments, and we detailed more
6 information in there.

7 AC ALJ COLBERT: So that means you're
8 not going to answer the question?

9 (Crosstalk.)

10 MR. HALSO: I was just going to ask if
11 I might venture a response, as the Joint
12 Commenters also mentioned enforcement?

13 AC ALJ COLBERT: Yes. Thank you.

14 MR. HALSO: Thank you, Assistant Chief.

15 I just note -- I would like to
16 distinguish here, the TNCs are the ones
17 charged with compliance with the clean mile
18 standard. So when we're speaking, at least
19 the joint commenters, about enforcement,
20 we're thinking about enforcement against the
21 TNCs as it relates to whether they are
22 compliant with the terms of the clean mile
23 standard, the annual GHG targets. There are
24 costs that will accompany that compliance.
25 And it's a major concern of ours and
26 highlight it in our first point.

27 In light of Jesus, as well,
28 (inaudible) about establishing a driver

1 assistance fund is, where do those costs
2 fall? And of course we want to ensure that
3 those costs fall not in a disproportionate
4 burdensome way on those that can least afford
5 it. To be explicit about why I mentioned
6 enforcement, Uber characterizes it in
7 comments, as you may know. There's sort of
8 an un-required supplement to the clean mile
9 standard. We think that's wrong on the law
10 and as a practical matter. But at this stage
11 of the proceeding, we simply want to ensure
12 it remains front and center and not treated
13 as a matter of secondary importance as we go
14 along in this rulemaking.

15 Thank you.

16 AC ALJ COLBERT: And -- thank you. And
17 I -- I'm glad that you stepped in. To circle
18 -- since you are, and to circle back to the
19 question that I asked Mr. Garcia, as the
20 legal structure stands right now, it would
21 seem that -- my understanding is that the
22 TNCs, for the most part, don't dictate what
23 kind of car a driver uses. I mean, you can
24 have a Camry or Tesla or whatever. I mean,
25 there's certain safety requirements, but they
26 don't say, "You have to use this type of
27 car."

28 So if -- again, if a driver is an

1 independent contractor, and they have the
2 choice, to some extent, of what kind of car
3 they use, and if the cars are not -- and if
4 drivers are being converted to low-emission
5 vehicles, I mean, would you want a situation
6 where the TNC says, "You have to convert to a
7 low-emission vehicle or you can no longer
8 drive for the platform"? Would that benefit
9 the driver?

10 MR. HALSO: Thank you, your Honor.
11 Well, yes, of course we're concerned about
12 outcomes from this proceeding that don't give
13 drivers a real choice at the end of day;
14 right? And I think that's why we're here to
15 talk about where the metes and bounds of the
16 plans for TNCs who, again, I'll emphasize are
17 the regulated entity here and must come up
18 with (sic) to comply with this proceeding.
19 And how can we, through incentives and
20 otherwise, ensure that drivers are treated
21 fairly throughout the TNC's actions to comply
22 with the regulation. But I don't know that
23 it's right to think about the drivers as
24 directly regulated here. And, again, we have
25 to think about how this moves through the
26 lens of the TNCs and -- I mean, that's why
27 we're emphasizing the driver assistance
28 fund and why we want to make sure that these

1 issues are squarely on the table as we move
2 forward.

3 ALJ WANG: Thank you.

4 And I see that Commissioner Shiroma
5 has a hand raised.

6 COMMISSIONER SHIROMA: Thank you, Judge
7 Wang. And thank you, AC Colbert.

8 I think that in the post-hearing
9 briefs that Judge Wang is outlining will be
10 requested that -- look, I know there is a
11 push/pull amongst the parties. There is
12 disagreement. And so, we will want your best
13 arguments in those post-hearing briefs. I am
14 cognisant that we are not going to be able to
15 resolve these issues, and -- today. But you
16 can see that we are keenly interested in
17 hearing from all of you and what your
18 arguments are. So I just wanted to put a pin
19 in that and turn the microphone back over to
20 Judge Wang.

21 Thank you.]

22 ALJ WANG: Thank you, Commissioner.

23 I will now take comment for party
24 representative to Uber Technologies.

25 MR. PRABHAKARAN: Thank you, your
26 Honor. This is Vid Prabhakaran on behalf of
27 Uber.

28 Uber agrees with the current issues

1 to be considered in this proceeding, but the
2 Commission should consider adding two other
3 issues.

4 First, what are the limitations of
5 the TNC business model to achieving the CMS,
6 including its dependency on other parts of
7 the supply chain, for example, auto
8 manufacturers, investor-owned electric
9 utilities, charging infrastructure providers.

10 Second, how can the Clean Miles
11 Standard foster and incentivize relationships
12 among the CPUC's regulated entities,
13 especially the electric utilities and the
14 TNCs.

15 I'd add, in response to Mr. Halso's
16 comments, we see no reason to limit
17 discussion of potential offset options at
18 this stage, given that they may be what's
19 best to achieve the optimal implementation of
20 the CMS as the CPUC is charged with.

21 Finally, there has been some
22 discussion about enforcement and compliance.
23 There is no question that the Commission
24 needs to be focused on ensuring that these
25 goals are achieved, but there has been
26 precedent of how these programs are set up to
27 best ensure flexibility, especially when a
28 program is just starting up as this one is.

1 So we'd like you to keep that in
2 mind and please do look at our comments. We
3 describe some of the other programs that the
4 Commission so helpfully raised in its own
5 scoping ruling to look at to use as precedent
6 here.

7 Finally, with respect to
8 categorization, Uber does recommend that the
9 proceeding remain categorized as quasi-leg.
10 We believe facilitating unfettered
11 conversations among the Commission and
12 stakeholders regarding the best possible
13 implementation of the CMS program is
14 appropriate here.

15 But we do want to mention that it is
16 certainly possible for the Commission to
17 determine that a specific phase ought to be
18 ratesetting if, for example, the Commission
19 were to decide to, you know, set a specific
20 electric rate for TNC drivers to incentivize
21 their switch to electric vehicles.

22 Thank you, your Honor.

23 ALJ WANG: Thank you.

24 AC ALJ COLBERT: Sorry, Judge Wang.

25 Counselor, does that ratesetting --
26 would that also include setting a rate to --
27 for a driver assistance program or a
28 surcharge?

1 MR. PRABHAKARAN: You know, your Honor,
2 we would need to look into that a bit more.
3 There is a question mark in my mind about the
4 general jurisdictional authority to setting
5 rates associated with charter-party carriers
6 and that entire regime.

7 But setting that aside, certainly
8 discussing an additional charge or a rate
9 would be worth further discussion here. As
10 we've mentioned in our own comments, we think
11 it's an idea worth discussing.

12 AC ALJ COLBERT: Okay. Well, to
13 Commissioner Shiroma's point, hopefully --
14 and Judge Wang's point -- hopefully that will
15 be considered in your post -- that issue will
16 be considered in your post-hearing briefs
17 because, as you know, your company is on
18 record as acknowledging that the Commission
19 has authority to set rates.

20 MR. PRABHAKARAN: Your Honor, I'll
21 defer to the post-hearing comments.

22 AC ALJ COLBERT: Thank you, Judge Wang.

23 ALJ WANG: Thank you.

24 Party representative for Waymo.

25 MS. DAVIDSON: Mari Davidson for Waymo.
26 Thank you, your Honor.

27 Waymo generally supports the scope
28 of the issues as is set forth in the OIR, but

1 we would ask to add that the Commission add
2 one additional issue, which is that the
3 Commission clarify, if it's a preliminary
4 matter, whether and how the proceeding and
5 the resulting regulatory framework applies to
6 autonomous vehicle charter-party carriers.

7 There's some ambiguity on this point
8 carrying over from the CARB proceeding, and
9 we think that the parties, including, of
10 course, ourselves, would benefit from early
11 clarification of applicability to
12 CPUC-regulated carriers beyond TNCs.

13 And then regarding preliminary
14 categorization, we have no objection to the
15 quasi-legislative category. Thank you.

16 ALJ WANG: Thank you.

17 Before we move on, please note that
18 while ex parte communications are permitted
19 for quasi-legislative proceedings, parties
20 should follow the following directions for
21 communicating with me:

22 Parties with procedural questions
23 should send an email to me and copy the
24 entire service list.

25 Parties should not communicate with
26 me about nonprocedural issues outside of a
27 public forum that has been noticed to the
28 service list of this proceeding.

1 On to the schedule and need for
2 evidentiary hearings. In the Order
3 Instituting Rulemaking, we included a
4 preliminary schedule. Parties will have the
5 opportunity to comment today on this
6 preliminary schedule, including which issues
7 should be prioritized for the first decision
8 in this proceeding.

9 In the Order Instituting Rulemaking,
10 we also preliminarily determined that
11 evidentiary hearings will not be necessary.
12 If you disagree, please identify the specific
13 material issues of fact that may require an
14 evidentiary hearing.

15 I will now call on party
16 representatives to comment. Before you
17 comment, please state your name and
18 organization for the record. Please comment
19 for no more than two minutes.

20 We will start with party
21 representative for Cal Advocates.

22 MR. HODEL: Thank you, your Honor.
23 Drew Hodel on behalf of Cal Advocates.

24 We have no objections to the
25 preliminary proceeding schedule as set forth
26 in the OIR. At the moment, Cal Advocates
27 does not believe hearings will be necessary
28 but reserves its right to request hearings

1 should any disputed issues of material fact
2 arise.

3 ALJ WANG: Thank you.

4 Party representative for Cruise.

5 MS. RAMAN: Thank you, your Honor.

6 Again, this is Prashanthi Raman with Cruise.

7 Cruise believes that the preliminary
8 proceeding schedule in the OIR is suitable;
9 however, should the Commission determine that
10 revisions to the program are merited, such as
11 the incentive modifications proposed by
12 Cruise and other parties, Cruise would
13 recommend that adequate time be allocated to
14 allow for stakeholder input on program
15 design, including a comment and consultation
16 period.

17 Regarding evidentiary hearings, at
18 this time Cruise does not believe that they
19 are necessary. CARB's initial rulemaking was
20 comprehensive; however, Cruise reserves the
21 right to request for evidentiary hearings
22 later in the proceeding.

23 And then, finally, in terms of what
24 should be prioritized, Cruise recommends that
25 any issues relating to, first, the amendment
26 to the incentive structure of the Clean Miles
27 Standard; secondly, accounting for the impact
28 of Clean Miles Standard for low-income and

1 moderate-income drivers; and, finally,
2 supporting and measuring the goals of clean
3 mobility for low- and moderate-income
4 individuals be prioritized for the first
5 decision.

6 The Commission decisions on these
7 issues will have a very significant impact on
8 how fleet operators and TNCs make durable
9 capital investments on EV infrastructure and
10 vehicle programs that will enable compliance
11 with the Clean Miles Standard.

12 Ensuring that parties to the
13 proceeding have sufficient time to anticipate
14 and respond to these amendments will ensure
15 that the Clean Miles Standard is as
16 successful as possible. Thank you.

17 ALJ WANG: Thank you.

18 Party representative for Lyft.

19 MS. WEAVER: Thank you, your Honor.
20 Janee Weaver on behalf of Lyft.

21 Lyft does not propose any changes to
22 the preliminary schedule as outlined in the
23 order instituting the rulemaking. Lyft
24 agrees that evidentiary hearings are not
25 necessary to determine any material issues of
26 fact.

27 Lyft believes that the CPUC should
28 prioritize early decisions for the TNC

1 Greenhouse Gas Emissions Reduction Plan and
2 Guidelines, as well as the citation and
3 penalty structure for noncompliance with the
4 Clean Miles Standard.

5 These decisions will be fundamental
6 to the TNC's ability to develop and implement
7 their respective Greenhouse Gas Emissions
8 Reduction Plans. Thank you.

9 ALJ WANG: Thank you.

10 Party representative for San
11 Francisco Taxi Workers Alliance.

12 MR. GRUBERG: Thank you, Your Honor.
13 Mark Gruberg for the San Francisco Taxi
14 Workers Alliance.

15 We don't have any objections to the
16 procedural schedule. As far as evidentiary
17 hearings are concerned, it's possible that
18 they may be required at some point to
19 elucidate some facts around, for instance,
20 the TNC usage and the issue that we brought
21 up of congestion and VMT miles. We would
22 like to see those issues prioritized in this
23 proceeding. Thank you.

24 ALJ WANG: Thank you.

25 Party representative for SEIU.

26 MR. GARCIA: This is Jesus Garcia with
27 SEIU, Local 721. We have our comments that
28 we submitted so I would refer back to those.

1 ALJ WANG: Thank you.

2 Party representative for Joint
3 Commenters.

4 MR. HALSO: Thank you, Judge Wang.
5 Again, this is Joe Halso for the Joint
6 Commenters.

7 I'll be brief. As the OIR
8 acknowledges, we're a bit behind on the
9 timeline set by SB 1014 so, given that, our
10 bottom line interest here is we want the
11 proceeding to move along as quickly as we can
12 while also ensuring we have robust discussion
13 on how to limit burdens on TNC drivers,
14 including hearing directly from those
15 drivers.

16 We think the preliminary schedule
17 meets that need as it's laid out in the OIR.
18 I'll just note we don't have any objection to
19 phasing or breaking out comments along issues
20 or into sections of a staff proposal.

21 And then no objection to the
22 preliminary determination that evidentiary
23 hearings are not necessary. Thank you.

24 ALJ WANG: Thank you.

25 Party representative for Uber
26 Technologies.

27 MR. PRABHAKARAN: Thank you, your
28 Honor. Vid Prabhakaran for Uber.

1 Given the many issues outlined for
2 resolution in this proceeding, Uber does
3 recommend a phased approach as we've
4 described in our opening comments.
5 Specifically, we thought that it made sense
6 to have three phases.

7 In the first phase, we would
8 recommend that the Commission focus on
9 getting the CMS program off the ground by
10 establishing clear guidance for stakeholders
11 on the GHG Emission Reduction Plans and what
12 and how to collect data for tracking and
13 verification purposes.

14 From this foundation, we believe the
15 second phase would focus on advancing CMS
16 program benefits to the LMI community, ESJ
17 efforts, and the optional credit programs.

18 Finally, in a third phase, Uber
19 would recommend that the Commission focus on
20 its outreach and engagement proposals and any
21 enforcement or compliance program that the
22 CPUC wishes to pursue.

23 We agree that evidentiary hearings
24 are not necessary. Instead, we recommend
25 that the Commission schedule a series of
26 workshops to lay the groundwork for the
27 program.

28 What we would suggest is that this

1 workshop be facilitated by Commission staff
2 to discuss possible plan templates, data
3 collection needs, et cetera, and that a staff
4 proposal be issued following that so that
5 parties could then comment on a proposal, and
6 that this sort of format apply to each phase.
7 Thank you, your Honor.

8 ALJ WANG: Thank you.

9 Party representative for Waymo.

10 MS. DAVIDSON: Thank you, your Honor.
11 Mari Davidson for Waymo.

12 Regarding schedule, consistent with
13 my earlier remarks regarding scope, Waymo
14 would very much appreciate early
15 clarification as to the applicability of
16 future requirements to CPUC-regulated TCPs.

17 And then beyond that, similar to
18 Mr. Prabhakaran's comments, we'd request that
19 the proceeding be phased by issue area with
20 the requirements of a GHG emissions plan and
21 data reporting requirements being considered
22 first with the examination of the remaining
23 issues in subsequent phases. We generally
24 believe that this phasing would allow for the
25 efficient and logical consideration of the
26 issues by all of the affected parties.

27 And, finally, as to the specific
28 schedule set forth in the OIR, we note that

1 we have a workshop coming up in early March,
2 but also similar to the Uber representative's
3 comments, we note that it may be advisable to
4 hold at least one additional workshop after
5 the issuance of the staff proposal and the
6 comment around that is contemplated in the
7 existing schedule to allow for refinement of
8 the staff proposal in a workshop and
9 collaborative setting.

10 Finally, regarding hearings, we
11 don't see any need for evidentiary hearings
12 at this time. Thank you.

13 ALJ WANG: Thank you.

14 I will now give each party a brief
15 opportunity to respond to other comments made
16 by other speakers on this agenda item or the
17 previous agenda item.

18 I will also ask that parties, if
19 they are requesting the ability to request
20 hearings later, propose a deadline for when
21 they would have the opportunity to request
22 evidentiary hearings. Also, parties should
23 let me know if they think that they're going
24 to need more than five pages to file in
25 prehearing conference statements after today.

26 I will start with party
27 representative to Advocates.

28 MR. HODEL: Thank you, your Honor.

1 Drew Hodel on behalf of Cal Advocates.

2 I do not anticipate we'll need more
3 than five pages. With respect to a deadline
4 for when we would request hearings, if we
5 decide we'd like hearings to be held, I would
6 suggest that the deadline come sometime
7 around when the staff proposal is going to be
8 issued in Quarter 2, 2022.

9 I believe you asked whether or not
10 we had any response to any comments from
11 other parties at this point. I think we
12 don't have a response to any particular
13 party, your Honor, but I think I would like
14 to add here our response to, I think, what
15 was one of your agenda items in your original
16 email ruling ahead of this prehearing
17 conference, and that was which issue should
18 be prioritized for the first decision.

19 I think it relates to what some
20 parties spoke to around different phases.
21 Here, your Honor, from Cal Advocates'
22 perspective, we'd request that our previously
23 proposed additional issue around whether or
24 not the implementation of any of the various
25 goals of this proceeding will impact
26 ratepayers and, if so, how.

27 Cal Advocates would request that
28 that be prioritized and discussed as part of

1 the first decision, as well as any subsequent
2 decisions that it may pertain to.

3 As I said at the outset of this
4 prehearing conference, Cal Advocates views
5 its suggested issue as an overarching issue
6 that should be heard together with all other
7 issues.

8 Please forgive me if I have failed
9 to respond to any other specific questions.

10 ALJ WANG: Thank you.]

11 Party representative to Cruise.

12 MS. RAMAN: Thank you, your Honor.
13 Prashanthi Raman with Cruise. And we do not
14 believe we will need more than four pages and
15 actually are -- Cruise is open to the
16 deadlines as they will be prepared with
17 regard to a request for hearing. But should
18 an answer be necessary at this point, I think
19 we are in agreement with Cal Advocates. That
20 seems a reasonable standpoint, to have a
21 deadline prior to the issue of the proposal.
22 And I don't believe we have specific
23 responses at this time.

24 With regards to other parties and
25 their comments, we are just pleased to have
26 had the opportunity to share our remarks
27 before the Commission and to the other
28 parties on today's call, and fully support

1 this effort and look forward to continuing
2 our engagement with the Commission and other
3 parties as we develop a program that can best
4 achieve the goals laid out in this
5 proceeding.

6 Thank you.

7 ALJ WANG: Thank you.

8 Party representative for Lyft.

9 MS. WEAVER: Thank you, your Honor.

10 Janee Weaver on behalf of Lyft. At this
11 time, Lyft does not wish to address any of
12 the comments made by the other presenters.
13 We will reserve our comment for our written
14 statement.

15 In regards to the written
16 statement, due to the number of issues that
17 were raised during this hearing, I would like
18 to request an increase in the page limit for
19 the written statement.

20 In regards to hearings, I do agree
21 with my constituents that the deadline should
22 be prior to the proposal. And we would,
23 therefore, defer to the Commission for any
24 further details.

25 Thank you.

26 ALJ WANG: Thank you.

27 Party representatives for San
28 Francisco Taxi Workers Alliance.

1 MR. GRUBER: Thank you, again, your
2 Honor. Mark Gruberg for the San Francisco
3 Taxi Workers Alliance.

4 And we would, first of all, resist
5 the temptation to comment on any of the
6 substantive items that came up earlier. But
7 we would like the opportunity to see the
8 scoping memo; and after that has been sent,
9 to have a reasonable amount of time to
10 request a hearing if we think that's
11 necessary -- maybe 30 days, or something
12 along those lines.

13 And I don't believe that we will
14 need any additional length to the memo that
15 we would be submitting after these -- after,
16 you know, this discussion. But, of course,
17 if it's offered to other parties, it would be
18 offered to all parties.

19 ALJ WANG: Thank you.

20 Party representative to SEIU.

21 MR. GARCIA: Thank you, your Honor.
22 This is Jesus Garcia with SEIU Local 721. I
23 don't believe we would need more than five
24 pages. And, also, no comments on today's --
25 for any other party here.

26 ALJ WANG: Thank you.

27 Party representative to Joint
28 Commenters.

1 MR. HALSO: Thank you, Judge Wang.
2 Again, this is Joe Halso for the Joint
3 Commenters.

4 On issues, I think I neglected to
5 say that we believe quasi-legislative is the
6 appropriate categorization for this
7 proceeding. I would also just reemphasize
8 the importance we see in limiting discussion
9 of optional credit mechanisms to exclude
10 credit trading and eVMT credits, which we
11 believe are not up for discussion (inaudible)
12 and would prolong the proceeding with
13 discussion of issues debated and decided at
14 CARB.

15 And timing is a key concern of ours.
16 So on scheduling, I noted we're okay with
17 breaking out comments on issues or sections
18 of a staff proposal or even phases, but so
19 long as we're able to remain within the
20 overall timeline laid out in the OIR. And
21 then I'll just note we think five pages is
22 sufficient.

23 Thank you.

24 ALJ WANG: Party representative Joe
25 Halso, in your response to the prehearing
26 conference, please also specifically address
27 whether quasi-legislative is appropriate for
28 consideration of the proposed fee and setting

1 that fee for the drivers assistance fund.

2 MR. HALSO: Okay. Thank you, Judge.

3 ALJ WANG: Thank you.

4 Party representative for Uber
5 Technologies.

6 MR. PRABHAKARAN: Thank you, your
7 Honor. This is Vid Prabhakaran for Uber.

8 The five-page limit is certainly
9 fine with us, so appreciate that. We wanted
10 to raise two points in response to issues
11 raised by other parties.

12 First, as a threshold matter, the
13 issue raised by Waymo as -- with respect to
14 whether or not TCPs are considered part of
15 the CMS program, we think of as an important
16 threshold issue and one that we would hope
17 could actually be addressed within your -- in
18 Judge -- in Commissioner Shiroma's assigned
19 Commissioner scoping memo.

20 Secondly -- and this is in response
21 to Mr. Hodel's comment about affordability.
22 I think that his comments reinforced our
23 request that the electric investor-owned
24 utilities be apart of these discussions.
25 They ought to be, to be able to really ensure
26 that we have the best possible solutions and
27 credit options to move forward with the CMS
28 program. So we would ask that as part of

1 your scoping memo, Commissioner Shiroma and
2 Judge Wang, that you consider asking that the
3 electric utilities also participate in this
4 proceeding.

5 Thank you, your Honor.

6 ALJ WANG: Thank you.

7 Party representative for Waymo.

8 MS. DAVIDSON: Thank you, your Honor.
9 Mari Davidson for Waymo.

10 As far as responding to other
11 parties, I would just add one thing to echo
12 the sentiment earlier expressed by
13 Mr. Prabhakaran for Uber. In the context of
14 credit program discussion that the Commission
15 not foreclose the consideration of issues
16 including a tradeable credits program at this
17 stage in the proceeding. We can address this
18 further, kind of, in written comments. But I
19 don't think we would necessarily agree that
20 the issues were fully litigated and finally
21 decided in the CARB rulemaking context.

22 As far as evidentiary hearing, we
23 don't have any strong preference on a
24 deadline to request evidentiary hearings.
25 And on page limit, the five-page PHC
26 statement limit is fine for us.

27 Thank you.

28 ALJ WANG: Thank you.

1 In closing, as a reminder, per my
2 ruling on January 31st, any party may file a
3 prehearing conference statement by February
4 23rd to address the issues on today's agenda
5 or to respond to comments made by parties
6 today. This includes parties that did not
7 participate in this -- in today's hearing as
8 well.

9 If you have questions about how to
10 file comments, or otherwise participate in a
11 Commission proceeding, please contact the
12 Commission's Public Advisor's office at
13 public.advisor@cpuc.ca.gov or call
14 (415) 703-2074.

15 Thank you for your participation
16 today. We are off the record and adjourned.

17 (Whereupon, at the hour of 11:48
18 a.m., this matter having been
19 concluded, the Commission then
20 adjourned.)

21 * * * * *]
22
23
24
25
26
27
28

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, ANDREA L. ROSS, CERTIFIED SHORTHAND REPORTER
NO. 7896, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON FEBRUARY 11, 2022.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS FEBRUARY 16, 2022.

A handwritten signature in black ink, reading "Andrea L. Ross". The signature is stylized with a large, looped "R" and a cursive "A".

ANDREA L. ROSS
CSR NO. 7896

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, KARLY POWERS, CERTIFIED SHORTHAND REPORTER
NO. 13991, IN AND FOR THE STATE OF CALIFORNIA DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON FEBRUARY 11, 2022.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS FEBRUARY 16, 2022.



KARLY POWERS
CSR NO. #13991

1	accountable 21:25 22:10	advisable 41:3	ambiguity 33:7
	accounting 35:27	Advisor's 49:12	amendment 35:25
1014 2:25 15:2 16:2,4 18:5 38:9	achieve 15:6 16:2 30:19 44:4	Advocates 4:21,24,26 7:23,25 8:1,9,26 9:17 34:21,23,26 41:27 42:1, 27 43:4,19	amendments 36:14
10:39 2:2	achieved 30:25	Advocates' 8:19 10:2 42:21	amount 13:18 17:20,24 45:9
11 2:2,6	achieving 21:25 22:10 30:5	Affairs 5:4	amply 15:9
11:48 49:17	acknowledge 25:26	affected 40:26	Andrea 3:13
2	acknowledges 38:8	affecting 7:12	annual 26:23
	acknowledging 32:18	afford 27:4	anticipate 36:13 42:2
2 42:8	action 3:10 4:7	affordability 47:21	apologies 6:13
2016 15:13	actions 28:21	agencies 25:21	apologize 8:14 12:28 21:17
2018 2:24	actively 23:7	agenda 3:23 41:16,17 42:15 49:4	appearances 3:25 4:2, 15
2022 2:2,6 42:8	activities 12:3	agree 39:23 44:20 48:19	appearing 4:23
21-11-014 2:8	add 16:9 30:15 33:1 42:14 48:11	agreement 43:19	applicability 33:11 40:15
22 25:12,17	added 8:3,28 9:18 10:25 14:12	agrees 29:28 36:24	applies 33:5
23rd 49:4	adding 8:8 30:2	ahead 42:16	apply 40:6
3	additional 11:20 12:2 14:3 16:11 32:8 33:2 41:4 42:23 45:14	Air 2:28	approach 39:3
	address 44:11 46:26 48:17 49:4	ALJ 3:16 4:27 5:5,10, 13,16,25 6:5,10,16,23 8:12,14,16,17 9:27 10:15,17 12:21,27 13:3, 11,16,24 14:6,8,18 16:14,23,25 17:27 18:15 19:4,7 21:5,11, 17,19 22:1,4 23:9,22 24:7,8,10,11 25:6,26 26:7,13 27:16 29:3,22 31:23,24 32:12,22,23 33:16 35:3 36:17 37:9, 24 38:1,24 40:8 41:13 43:10 44:7,26 45:19,26 46:24 47:3 48:6,28	approaches 20:21
	addressed 18:16 20:23 47:17	all-electric 10:22	appropriately 21:24
4	adequate 35:13	Alliance 5:12,15,22 14:20 37:11,14 44:28 45:3	apt 18:13
	adjourned 49:16,18	allocated 35:13	area 15:12 40:19
415 703-2074 49:14	adjusted 13:14	allowing 11:3,12,19 12:1	argue 8:27
7	adjustments 25:24	altered 25:19	arguments 29:13,18
	administered 22:21		arise 35:2
721 6:22 21:22,27 22:7, 12 37:27 45:22	administering 24:5		asks 22:12
A	administrated 23:27		assessment 22:15
a.m. 2:2 49:17	Administrative 2:4,11 25:7		assigned 2:11,13,18 3:11,21 47:18
ability 11:7 37:6 41:19	adopt 22:22		assistance 19:26 20:4 22:25 23:15,26 27:1 28:27 31:27 47:1
AC 8:14,17 9:27 10:15 12:27 13:3,11,16,24 14:6 16:25 17:27 18:15 19:4 24:8,11 25:6,26 26:7,13 27:16 29:7 31:24 32:12,22	adopted 3:1		Assistant 8:15,16 12:28 16:26 24:12 25:2, 6,8 26:14
accompany 26:24	adoption 11:14		assume 26:2
	advancing 39:15		attorney 4:23
			attributable 15:12

audio 17:16 21:28		Chief 8:15,16 12:28 16:26 24:12 25:6,8 26:14	comments 4:4,9,12 7:2 9:14 10:18 14:4 15:1 20:3 23:6 24:2 26:5 27:7 30:16 31:2 32:10,21 37:27 38:19 39:4 40:18 41:3,15 42:10 43:25 44:12 45:24 46:17 47:22 48:18 49:5,10
authority 15:20 32:4, 19	<hr/> C <hr/>		Commission 4:2,25 10:7 12:5 14:23 15:19 18:12 19:16,20 20:9,20 22:13 23:2,28 30:2,23 31:4,11,16,18 32:18 33:1,3 35:9 36:6 39:8, 19,25 40:1 43:27 44:2, 23 48:14 49:11,18
auto 30:7	Cal 4:21,26 7:23,25 8:1, 9,19,26 9:17 10:2 34:21,23,26 42:1,21,27 43:4,19	choice 28:2,13	Commission's 3:9 49:12
automatically 4:6	California 2:9,28 4:24 10:23 22:12	circle 27:17,18	Commissioner 2:12, 13,14,16,19 3:16,21 21:9,13,18 29:4,6,22 32:13 47:18,19 48:1
autonomous 10:22 33:6	call 4:16 7:16 23:25 34:15 43:28 49:13	citation 37:2	communicate 33:25
avoid 20:22	Camry 27:24	clarification 13:4 16:24 19:5 20:21 33:11 40:15	communicating 33:21
aware 15:7	capital 36:9	clarify 14:4 33:3	communications 33:18
<hr/> B <hr/>	car 10:22 27:23,27 28:2	clean 2:9,22,23 3:6 9:4 10:26 11:2,9 12:7 21:23 22:8 25:24 26:17,22 27:8 30:10 35:26,28 36:2,11,15 37:4	community 39:16
back 3:15 15:16 18:25 27:18 29:19 37:28	CARB 20:23 25:21 33:8 46:14 48:21	cleaner 12:8	commuting 16:7 18:22
based 10:23,27	CARB's 35:19	clear 9:9 13:7,26 39:10	companies 2:27
basis 4:14 8:21 9:3,26	carbon 11:6,11	closing 49:1	company 10:23 32:17
behalf 5:20 7:25 8:25 14:11 19:10 21:22 22:7 29:26 34:23 36:20 42:1 44:10	carriers 32:5 33:6,12	Club 5:20,21	completed 22:20
believes 14:14 35:7 36:27	carrying 33:8	CM 25:24	compliance 26:17,24 30:22 36:10 39:21
benefit 28:8 33:10	cars 28:3	CMS 9:16 30:5,20 31:13 39:9,15 47:15,27	compliant 26:22
benefits 39:16	case 11:26	co-locate 11:22	comply 28:18,21
bill 2:25 17:1	categorization 3:26 6:12,25 7:14,18 14:14 31:8 33:14 46:6	co-located 13:9,17	comprehensive 35:20
bill's 17:3	categorized 7:9 31:9	Code 18:9	concern 8:22,23 14:26 26:25 46:15
bit 32:2 38:8	category 33:15	cognisant 29:14	concerned 5:22 17:15 21:1 28:11 37:17
blind 15:21	caution 20:24	Colbert 8:14,15,17 9:27 10:15 12:27,28 13:3,11,16,24 14:6 16:25,26 17:27 18:15 19:4 24:8,11,12 25:6,26 26:7,13 27:16 29:7 31:24 32:12,22	concluded 49:18
Bluegreen 5:22	center 27:12	collaborative 41:9	conference 2:7,22 3:18 4:17 23:12 41:25 42:17 43:4 46:26 49:3
Board 2:28	cetera 40:3	collect 39:12	
bottom 38:10	chain 30:7	collection 40:3	
bounds 28:15	characterizes 27:6	comment 7:6,13,17,19, 21 8:2,9 29:23 34:5,16, 17,18 35:15 40:5 41:6 44:13 45:5 47:21	
breaking 38:19 46:17	charge 12:12 13:18 32:8	commenter 23:1	
briefs 29:9,13 32:16	charged 14:2 26:17 30:20	commenters 5:17,21 19:8,11 26:12,19 38:3,6 45:28 46:3	
broad 8:20,28 9:1	chargers 11:23,24,28		
brought 37:20	charging 9:9 10:1,3 11:17,21,26 12:3,13 13:5,6 20:2 22:27 23:16,17 30:9		
burdens 38:13	charter-party 32:5 33:6		
burdensome 27:4			
burning 16:6			
business 11:26 30:5			

congestion 14:25,26 15:2,10,11,24,25 16:10, 28 17:1,18,20,21,24,25, 28 18:5,8,10,16,26 37:21	copy 33:23	43:21 44:21 48:24	directly 28:24 38:14
consequences 26:1	correction 6:18	deadlines 43:16	disagree 34:12
consideration 7:10 10:14 20:8 23:5 40:25 46:28 48:15	cost 10:4 13:17 16:10 25:28	dealing 15:4	disagreement 29:12
considerations 23:3	costs 26:24 27:1,3	debated 46:13	discuss 3:18,24,25,27 7:1 40:2
considered 24:15,19 30:1 32:15,16 40:21 47:14	counsel 5:8,19 6:9	decarbonize 11:8	discussed 42:28
consistent 3:8 40:12	Counselor 31:25	decide 31:19 42:5	discussing 32:8,11
consolidated 21:14	counts 15:2	decided 46:13 48:21	discussion 6:25 18:14 20:17 30:17,22 32:9 38:12 45:16 46:8,11,13 48:14
consolidating 20:25	couple 18:8,24 23:10	decision 34:7 36:5 42:18 43:1	discussions 47:24
consolidation 21:1	court 3:13	decisions 36:6,28 37:5 43:2	disproportionate 27:3
constituents 26:3 44:21	CPUC 12:1 30:20 36:27 39:22	decreasing 11:11	disputed 35:1
consultation 35:15	CPUC's 30:12	dedicated 11:23 13:5,6	distinguish 26:16
contact 49:11	CPUC-REGULATED 33:12 40:16	defer 32:21 44:23	documented 15:9
contemplate 24:28	credit 11:2 13:7 20:15, 18,19 39:17 46:9,10 47:27 48:14	deficit-generating 11:5	downtown 15:12
contemplated 10:5 41:6	crediting 11:20 20:17	defined 20:16	Drew 4:23 7:25 8:25 34:23 42:1
contention 16:28	credits 11:4,12 12:2 13:12,16,19,21,25 14:1 46:10 48:16	definition 17:28 18:3	drive 18:24 20:26 28:8
context 48:13,21	critical 19:18	degree 15:15 16:3	driven 11:13 12:14
continue 17:13	Crosstalk 12:26 21:8, 16 25:4 26:9	deliberated 12:20	driver 19:25 20:4 26:28 27:23,28 28:9,27 31:27
continuing 24:14 25:13 44:1	Cruise 5:1,4 8:13 10:19,21,24 35:4,6,7, 12,18,20,24 43:11,13, 15	dependency 30:6	drivers 3:6 5:23 18:22 19:23 20:1,13 22:26 23:15,25 24:18,23,26 25:13,18 26:2 28:4,13, 20,23 31:20 36:1 38:13, 15 47:1
contractor 28:1	CUP 25:22	detailed 24:2 26:5	driving 18:25
contractors 24:20 25:14	current 25:18 29:28	details 44:24	due 44:16
contributor 14:28	<hr/> D <hr/>	determination 38:22	durable 36:8
controlled 22:21 23:27	D-A-V-I-D-S-O-N 6:8	determine 31:17 35:9 36:25	<hr/> E <hr/>
conversations 31:11	data 39:12 40:2,21	determined 3:20 34:10	earlier 40:13 45:6 48:12
convert 17:3 24:24,26 28:6	Davidson 6:7,8 32:25 40:10,11 48:8,9	develop 37:6 44:3	early 33:10 36:28 40:14 41:1
converted 28:4	Davis 6:2	development 25:21	echo 48:11
converting 11:1	day 28:13	dictate 27:22	efficient 9:21 40:25
coordinated 10:12	days 18:24 45:11	direction 18:21	effort 3:5 44:1
coordination 9:19	deadline 41:20 42:3,6	directions 33:20	
		directive 20:12	

efforts 39:17	equal 19:17	fact 25:16 34:13 35:1 36:26	forgotten 9:25
electric 9:6 10:28 19:28 21:26 22:11,26 30:8,13 31:20,21 47:23 48:3	equipment 20:2	facts 37:19	formal 25:22
electrification 9:20 20:26	equitable 22:17	failed 24:24 43:8	format 40:6
elucidate 37:19	ESJ 39:16	fair 20:19	forum 18:12 33:27
email 33:23 42:16	establish 7:11	fairly 28:21	forward 3:14 23:7 29:2 44:1 47:27
emission 22:18 39:11	established 2:24	fall 26:1 27:2,3	foster 30:11
emissions 2:26 9:11 12:10,15 14:28 15:27 16:3,4,12 17:6,9 18:2, 27 37:1,7 40:20	establishing 19:25 26:28 39:10	faster 11:14	foundation 39:14
emphasize 19:15 28:16	EV 11:22,26 12:7 23:16, 17 36:9	FCV 12:7	frame 18:7
emphasizing 28:27	evidentiary 34:2,11,14 35:17,21 36:24 37:16 38:22 39:23 41:11,22 48:22,24	feature 3:4	framework 20:26 33:5
employee 25:18	evmt 20:17 46:10	February 2:2,6 49:3	Francisco 5:12,14 10:23 14:20 15:8 18:23 37:11,13 44:28 45:2
enable 36:10	EVS 11:15 24:21	fee 19:27 46:28 47:1	free 12:15 15:27
enabling 11:20	examination 40:22	fees 22:24	front 27:12
encourage 22:22	exclude 20:16 46:9	file 4:12 41:24 49:2,10	fuel 11:6,8 12:6
end 15:6 28:13	excludes 20:20	filed 4:9	fueling 12:13
energy 12:12 14:2,3	exclusive 15:19	files 4:4	full 4:19 15:16
enforcement 19:17 23:3 24:15,17,23,28 25:10,28 26:12,19,20 27:6 30:22 39:21	excuse 9:24 12:12 13:14,15 22:1	filing 23:24	fully 12:6 15:10 43:28 48:20
engagement 39:20 44:2	existing 22:15 41:7	finally 20:24 30:21 31:7 35:23 36:1 39:18 40:27 41:10 48:20	fund 9:16 19:26 20:4 22:20 23:15,26 27:1 28:28 47:1
engaging 23:7	expand 14:24	financed 19:26	fundamental 37:5
enormous 15:9	expanded 10:4,6,10 19:13	financial 22:15,25	funds 11:15 24:5
ensure 3:4 9:18 12:13 19:16 21:23 22:8,16 27:2,11 28:20 30:27 36:14 47:25	expect 17:13,23,25	fine 47:9 48:26	future 15:18 40:16
ensuring 19:22 30:24 36:12 38:12	expenses 22:27	five-page 47:8 48:25	
entire 32:6 33:24	explicit 27:5	fleet 11:16 22:17 36:8	
entities 7:12 24:6 30:12	explicitly 16:22	fleet-enabled 12:4	
entity 28:17	expressed 20:5,6 48:12	fleets 11:5,25	G
environmental 3:9 14:26 16:17	extent 28:2	flexibility 30:27	Garcia 6:21,22 21:10, 20,21 22:5,6 23:20 24:1,11 25:2,5,8 26:4 27:19 37:26 45:21,22
	extremely 8:20 11:7	FLO 9:13	gas 2:26 9:7 16:6 21:25 22:10 24:24,26 37:1,7
	eye 15:21	focus 39:8,15,19	gas-powered 12:9
		focused 12:19 30:24	gave 25:12
		focusing 17:27 18:1	general 32:4
		follow 14:4 16:26 33:20	generally 32:27 40:23
		follow-up 23:10	generate 14:3
		force 15:17	generated 12:2
		forcefully 15:17	
		foreclose 48:15	
		forgive 13:27 43:8	
	F		
	facilitated 40:1		
	facilitating 31:10		

generates 12:9 16:12	hear 16:20	15:9 19:23 20:12 35:27 36:7 42:25	information-only 4:13
Genevieve 2:12,18	heard 43:6		informed 4:11
GHG 15:28 16:11 26:23 39:11 40:20	hearing 29:17 34:14 38:14 43:17 44:17 45:10 48:22 49:7	impacted 8:21	infrastructure 9:10 10:1,3,6 11:18,22 22:28 23:16,18 30:9 36:9
GHGS 15:3	hearings 3:28 34:2,11, 27,28 35:17,21 36:24 37:17 38:23 39:23 41:10,11,20,22 42:4,5 44:20 48:24	impacts 9:21 10:13 15:14,22	
give 28:12 41:14	heavier 15:27	implement 2:8 3:3 37:6	inherently 12:8,18
glad 27:17	held 42:5	implementation 8:5 9:4 30:19 31:13 42:24	initial 35:19
glitch 17:16 21:28	helpful 14:5,6	implemented 17:2,8	input 35:14
Global 5:3	helpfully 31:4	import 19:17	installation 11:17
goal 16:4 18:11	Hey 8:17	importance 20:10 27:13 46:8	instance 18:22 37:19
goals 3:1,8 8:5 9:4 15:3 18:6 30:25 36:2 42:25 44:4	highlight 26:26	important 19:21 47:15	instituting 4:3,5,9 7:4, 8,28 34:3,9 36:23
Good 2:17 8:17	Hodel 4:22,23 7:24,25 8:24,25 10:8 34:22,23 41:28 42:1	inaudible 22:28 26:28 46:11	intend 4:12
Government 5:4 18:9	Hodel's 47:21	incentive 11:3 35:11, 26	intensity 11:11
greater 11:16	hold 22:9 41:4	incentives 28:19	intent 17:3
greenhouse 2:26 9:7 21:25 22:10 37:1,7	holds 21:24	incentivize 11:14 12:6 30:11 31:20	intentionally 9:1
ground 39:9	home 23:17,21	incentivizing 10:27 12:11	interest 20:6 38:10
groundwork 39:26	Honor 4:22 5:2,7 6:7, 13,21 7:24 10:16,20 12:24,27 14:7,10,22 16:25 19:6 21:20 22:5 23:20 24:2,8 28:10 29:26 31:22 32:1,20,26 34:22 35:5 36:19 37:12 38:28 40:7,10 41:28 42:13,21 43:12 44:9 45:2,21 47:7 48:5,8	include 5:21 14:24 18:5 22:14 31:26	interested 23:13 29:16
grow 17:21	hope 20:8 47:16	included 6:27 7:5 16:16,20,22 23:14 34:3	investments 36:9
GRUBER 45:1	hour 49:17	includes 23:16 49:6	investor-owned 9:15 30:8 47:23
Gruberg 5:13,14 14:21, 22 16:15,19,27 17:10, 17 18:3,18 37:12,13 45:2	hundreds 16:5,7 18:23,25	including 9:13 30:6 33:9 34:6 35:15 38:14 48:16	issuance 41:5
guidance 39:10		Incorporated 6:3	issue 8:3,9,27 9:17 14:25 16:8,9,10,22 17:28 18:1 19:16 20:14 23:4 24:20 32:15 33:2 37:20 40:19 42:17,23 43:5,21 47:13,16
Guidelines 37:2		increase 17:1,14,26 44:18	issued 40:4 42:8
<hr/> H <hr/>		increased 17:11	issues 3:18,26 6:11,24, 26,27 7:1,5,15,17,27 8:11 10:11 14:12,16 15:23 18:26,27 19:12, 14,21 20:22,27 22:14 29:1,15,28 30:3 32:28 33:26 34:6,13 35:1,25 36:7,25 37:22 38:19 39:1 40:23,26 43:7 44:16 46:4,13,17 47:10 48:15,20 49:4
Halso 5:18,19 6:13 19:8,9,10 23:1 26:10,14 28:10 38:4,5 46:1,2,25 47:2		increases 3:6	item 11:1,19 41:16,17
Halso's 30:15	<hr/> I <hr/>	increasing 11:27	items 10:24 16:17 42:15 45:6
hand 15:26 29:5	idea 32:11	independent 24:19 25:14 28:1	it's 18:3,6 25:6,16
happening 25:15	identify 34:12	indication 17:22	
happy 16:20	ignorance 13:27	individuals 3:8 36:4	
harm 3:5	impact 8:6 9:8 11:10	information 26:6	
he/him 6:4			

26:25 28:23 45:17	lens 28:26	make 2:15 4:10 10:26 25:23 28:28 36:8	mind 15:25 31:2 32:3
<hr/> J <hr/>	letter 24:3	managing 6:8	minimal 19:22
Janee 5:8 12:22 14:9, 11 36:20 44:10	Let's 22:4	manufacturers 30:8	minutes 7:21 34:19
January 49:2	light 26:27	March 41:1	missed 6:14 13:13
Jesus 6:22 21:10,21 22:6 26:27 37:26 45:22	limit 30:16 38:13 44:18 47:8 48:25,26	Mari 6:8 32:25 40:11 48:9	mobility 3:7 36:3
Joe 5:19 19:8,10 21:14 23:1 38:5 46:2,24	limitations 30:4	mark 5:14 14:20 16:15 32:3 37:13 45:2	model 30:5
join 2:21 4:13	limited 6:26	market 10:27 11:13	moderate-income 3:6,7 19:23 20:13 26:2 36:1,3
joint 5:17,21 19:8,11 23:1 26:11,19 38:2,5 45:27 46:2	limiting 46:8	material 34:13 35:1 36:25	modifications 35:11
judge 2:4,11 3:12,15 5:18,28 8:15 19:9 25:7 29:6,9,20 31:24 32:14, 22 38:4 46:1 47:2,18 48:2	lines 45:12	materially 25:19	modified 7:7 18:4
judicial 25:20	list 3:24 4:1,13 6:15 7:26 19:12,15 21:10 23:3,4 33:24,28	matter 27:10,13 33:4 47:12 49:17	moment 6:16 7:16 34:26
jurisdictional 32:4	litigated 48:20	matters 3:19,20 7:11	morning 2:17 5:20 8:17
Justice 3:10 16:18	litigation 25:15	maximum 16:2	motion 4:10
<hr/> K <hr/>	LMI 39:16	means 26:7	move 29:1 33:17 38:11 47:27
Karly 3:13	Local 6:22 21:22 22:7 37:27 45:22	meant 13:8	moves 28:25
keenly 29:16	location 18:14	measuring 36:2	<hr/> N <hr/>
key 3:4 46:15	logical 40:25	mechanisms 22:16 46:9	naming 20:10
kind 20:18,28 21:14 27:23 28:2 48:18	long 46:19	meets 38:17	necessarily 10:9 48:19
<hr/> L <hr/>	longer 28:7	Members 4:8	negative 15:22
laid 38:17 44:4 46:20	lots 18:28	memo 3:22 19:24 20:11,16 45:8,14 47:19 48:1	neglected 46:4
Lastly 12:5	Low 11:6	mention 31:15	network 2:27 13:14
law 2:4,11 25:7 27:9	low- 3:5,7 19:23 20:13 26:1 36:3	mentioned 9:28 13:16 18:8 23:1 24:13,14 26:12 27:5 32:10	non-tnc 12:3
lay 39:26	low-emission 17:4 24:25 28:4,7	merited 35:10	noncompliance 37:3
LC 11:10	low-income 35:28	met 16:5 24:21	nonprocedural 33:26
left 20:20	lower 9:11	metes 28:15	not-too-distant 15:18
legal 27:20	lower-emission 24:27	microphone 29:19	note 26:15 33:17 38:18 40:28 41:3 46:21
legislation 25:19	Lyft 5:6,9 12:22 14:9, 11,13 36:18,20,21,23, 27 44:8,10,11	mile 9:7 12:14 21:23,26 22:8,11 25:24 26:17,22 27:8	noted 17:2 46:16
length 45:14	<hr/> M <hr/>	miles 2:9,22,23 9:5,6 10:26 11:2,9 12:7 16:7, 11 18:23,25 24:22 30:10 35:26,28 36:11, 15 37:4,21	noticed 33:27
	made 4:6 8:18 13:10 39:5 41:15 44:12 49:5		number 15:4 17:8,10 44:16
	main 18:7		numbers 15:7 17:14 19:2
	major 26:25		

O	outset 43:3 over-compliance 11:4,12 overarching 8:3,8 43:5 overlap 20:28 owned 12:4	period 35:16 permitted 33:18 person 4:4 personal 15:23 perspective 42:22 pertain 43:2	Prashanthi 5:3 10:21 35:6 43:13 precedent 30:26 31:5 preference 48:23 prehearing 2:7,22 3:17 23:12 41:25 42:16 43:4 46:25 49:3
objection 8:10 33:14 38:18,21	P	phase 31:17 39:7,15,18 40:6	preliminarily 7:9 34:10
objections 34:24 37:15	pages 41:24 42:3 43:14 45:24 46:21	phased 39:3 40:19	preliminary 7:5,7,26 16:16 22:14 33:3,13 34:4,6,25 35:7 36:22 38:16,22
obvious 18:19	paid 9:11	phases 39:6 40:23 42:20 46:18	prepared 43:16
offered 45:17,18	pandemic 15:16 17:12	phasing 38:19 40:24	presenters 44:12
office 4:24 49:12	parking 18:28	PHC 3:14 48:25	presents 16:8
offset 30:17	part 18:6 19:22 27:22 42:28 47:14,28	pin 29:18	President 5:3
OIR 9:14 14:24 19:13 20:26 32:28 34:26 35:8 38:7,17 40:28 46:20	parte 33:18	place 18:14	previous 41:17
one-fourth 15:10	participate 48:3 49:7, 10	places 18:9	previously 42:22
one-third 15:11	participation 49:15	plan 3:10 37:1 40:2,20	price 11:13
one-to-one 17:5	parties 4:6 7:6,13 9:12 20:5 29:11 33:9,19,22, 25 34:4 35:12 36:12 40:5,26 41:18,22 42:11, 20 43:24,28 44:3 45:17, 18 47:11 48:11 49:5,6	plans 28:16 37:8 39:11	principle 19:2
open 20:20 43:15	partner 6:2	platform 28:8	prior 43:21 44:22
opening 39:4	parts 30:6	pleased 2:21 43:25	prioritize 36:28
operations 15:22	party 4:10,14,16,17,20, 28 5:6,11,26 6:6,19 7:16,22 8:13 12:22 14:8,19 19:7 21:6 29:23 32:24 34:15,20 35:4 36:18 37:10,25 38:2,25 40:9 41:14,26 42:13 43:11 44:8,27 45:20,25, 27 46:24 47:4 48:7 49:2	point 9:24 24:19 26:26 32:13,14 33:7 37:18 42:11 43:18	prioritized 34:7 35:24 36:4 37:22 42:18,28
operators 36:8	past 17:22	pointed 15:1	procedural 3:19 33:22 37:16
opportunity 34:5 41:15,21 43:26 45:7	paying 13:20	points 47:10	procedure 9:28
opposed 13:19	penalty 37:3	policies 7:11	proceeding 2:1,12,19 3:27,28 4:6 6:28 7:9,18, 27 8:4,6,11 9:8,19,20 10:5,7,11,12,13,26 12:16,18 14:13,15,17 16:12 18:1 20:8,23 23:8 27:11 28:12,18 30:1 31:9 33:4,8,28 34:8,25 35:8,22 36:13 37:23 38:11 39:2 40:19 42:25 44:5 46:7,12 48:4,17 49:11
optimal 30:19	people 18:28	policy 12:19	proceedings 4:2 21:3 33:19
option 19:25 25:12	per-mile 19:27 22:19	pollution 15:23,26,28	process 10:1 25:23
optional 20:15,19 39:17 46:9	performance 17:22	position 10:2,8,10	program 2:9 3:1,3 9:16 11:3 30:28 31:13,27 35:10,14 39:9,16,21,27
options 3:7 30:17 47:27		post 32:15	
order 4:3,5,9 7:4,8,28 25:23 34:2,9 36:23		post-hearing 29:8,13 32:16,21	
orders 25:20		potential 30:17	
organization 4:18 7:20 34:18		Powers 3:13	
original 42:15		Prabhakaran 5:28 6:1 29:25,26 32:1,20 38:27, 28 47:6,7 48:13	
originally 8:10		Prabhakaran's 40:18	
outcomes 28:12		practical 27:10	
outlined 36:22 39:1			
outlining 29:9			
outreach 39:20			

44:3 47:15,28 48:14,16	46:5,27	refer 37:28	representative 4:17, 21,28 5:6,11,26 6:6,19 7:23 8:13,19 12:22 14:8,19 19:7 29:24 32:24 34:21 35:4 36:18 37:10,25 38:2,25 40:9 41:27 43:11 44:8 45:20, 27 46:24 47:4 48:7
programs 20:15,20 30:26 31:3 36:10 39:17	question 6:27 8:25 9:2, 24,25 13:1 16:14,27 23:19,22 26:8 27:19 30:23 32:3	refers 18:10	representative's 41:2
prolong 21:2 46:12	questions 7:3 23:10 24:9 33:22 43:9 49:9	refine 19:21	representatives 4:16 7:17 21:6 34:16 44:27
pronouns 2:20 6:3	quickly 38:11	refinement 41:7	representing 6:2
Prop 25:12,17		regard 43:17	request 8:2,28 9:3,26 34:28 35:21 40:18 41:19,21 42:4,22,27 43:17 44:18 45:10 47:23 48:24
proposal 20:6 38:20 40:4,5 41:5,8 42:7 43:21 44:22 46:18	R	regime 32:6	requested 29:10
proposals 39:20		regulated 7:12 28:17, 24 30:12	requesting 10:18 41:19
propose 14:12 36:21 41:20	raise 47:10	regulation 19:19 21:24 28:22	requests 9:17
proposed 7:15 14:16 16:16 35:11 42:23 46:28	raised 29:5 31:4 44:17 47:11,13	regulations 22:9,23 25:20,25	require 34:13
provide 22:25	Raman 5:2,3 10:20,21 13:1,2,3,9,13,21,28 35:5,6 43:12,13	regulatory 5:8 15:20 33:5	required 22:16,19 37:18
providers 30:9	rate 31:20,26 32:8	reinforced 47:22	requirements 27:25 40:16,20,21
provision 18:9	ratepayer 9:21 10:13	related 20:2,27	requiring 24:26
publically 11:24	ratepayers 8:6,20 9:8, 15 42:26	relates 26:21 42:19	reserve 7:2 44:13
public 4:8,24,25 11:20 13:5,6,22,25 14:1,2 22:12 23:18,27 24:1 26:5 33:27 49:12	rates 32:5,19	relating 35:25	reserves 34:28 35:20
public.advisor@cpuc.ca.gov 49:13	ratesetting 12:19 31:18,25	relationships 30:11	resist 45:4
publicly 11:28	re- 25:12	relevant 25:23	resolution 39:2
PUC 22:21 24:4	read 16:19 18:7	relitigating 20:22	resolve 7:1 29:15
purchasable 11:4	real 22:19 28:13	remain 9:22 12:17 31:9 46:19	Resources 2:28
purchase 20:1 22:26 24:22	reason 30:16	remaining 40:22	respect 7:26 31:7 42:3 47:13
purpose 2:25 3:17	reasonable 9:22 43:20 45:9	remains 19:17 27:12	respectfully 21:27 22:12
purposes 39:13	reasoning 24:4	remarks 13:10 40:13 43:26	respective 37:7
pursue 39:22	recommend 31:8 35:13 39:3,8,19,24	reminder 49:1	respond 36:14 41:15 43:9 49:5
push/pull 29:11	recommends 10:24 35:24	remission 15:15	respondents 4:3
put 29:18	record 2:5 7:20 22:2,3, 4 32:18 34:18 49:16	remove 23:2	responding 48:10
Q	reduced 24:22	removed 19:14	response 26:11 30:15 42:10,12,14 46:25
Quarter 42:8	reducing 2:25 15:3	renewable 12:6,11,12	
quasi-leg 31:9	reduction 15:2 16:3,4 18:6,16 19:2 37:1,8 39:11	reopen 25:22	
quasi-legislative 7:10 12:17 14:15 33:15,19	reemphasize 46:7	replace 17:18	
		replicate 11:10	
		reporters 3:13	
		reporting 40:21	
		represent 4:19	

47:10,20	scoping 3:21 16:17 19:24 20:11,16 31:5 45:8 47:19 48:1	skipped 21:12	statement 2:15 8:18 23:12,14 44:14,16,19 48:26 49:3
responses 14:5 43:23	secondary 27:13	sleeping 18:28	statements 41:25
responsibility 3:3	sections 38:20 46:17	Social 3:9 16:17	stations 13:5,7
resulting 33:5	seeks 16:2	solely 22:24	status 4:11 25:18
revenue 22:23	SEIU 6:14,20,22 20:3 21:10,22,26 22:7,11 37:25,27 45:20,22	solution 20:10	statute 3:2
revise 22:13	Senate 2:25	solutions 47:26	statutory 20:12
revisions 35:10	send 33:23	sort 27:7 40:6	stay 4:11
ride-hailing 11:23,25	sense 39:5	speakers 24:14 41:16	Stephanie 2:10 3:12
rideshare 5:23 11:15, 17 12:4	sentiment 48:12	speaking 5:20 21:21 22:6 26:18	stepped 27:17
ridesharing 10:28 12:8,9,14	series 39:25	specific 8:22 31:17,19 34:12 40:27 43:9,22	stipulating 22:23
robust 38:12	service 3:24 4:1,13 33:24,28	specifically 16:21 19:24 23:15,25,26 39:5 46:26	stock 11:9 12:6
Ross 3:13	Services 9:13	spoke 42:20	streets 15:5 16:6
route 13:23	set 8:10 17:12 30:26 31:19 32:19,28 34:25 38:9 40:28	squarely 29:1	strengthen 11:25
rulemaking 2:8 4:4,5, 10 7:4,8 8:1 27:14 34:3, 9 35:19 36:23 48:21	setting 31:26 32:4,7 41:9 46:28	staff 38:20 40:1,3 41:5, 8 42:7 46:18	strong 48:23
rules 7:12	severest 15:14	stage 27:10 30:18 48:17	structure 27:20 35:26 37:3
ruling 25:23 31:5 42:16 49:2	share 43:26	stakeholder 35:14	structured 11:10
<hr/>			
S			
<hr/>			
safety 15:23 16:8 18:27 27:25	shared 10:22 13:9	stakeholders 31:12 39:10	submitted 24:1 26:4 37:28
San 5:11,14 10:23 14:19 15:8 18:23 37:10, 13 44:27 45:2	she/her 2:20	stand 25:27	submitting 45:15
SB 15:2 16:2,4 18:4 38:9	sheer 15:4	standard 2:9,23 9:5 10:26 11:2,6,9 12:7 21:24 22:9 25:25 26:18, 23 27:9 30:11 35:27,28 36:11,15 37:4	subsequent 40:23 43:1
schedule 3:19,28 34:1, 4,6,25 35:8 36:22 37:16 38:16 39:25 40:12,28 41:7	shift 11:21	standards 24:21	substantive 7:2 45:6
scheduling 46:16	Shiroma 2:12,14,16,18 21:9,13,18 29:4,6 48:1	standpoint 17:18 43:20	successful 11:7 36:16
Scientists 5:23	Shiroma's 32:13 47:18	stands 27:20	sufficient 36:13 46:22
scope 3:19,26 6:11,24, 26,28 7:1,5,7,15,18,27 8:28 9:18 10:25 14:13, 17,24 19:21 22:14 32:27 40:13	sic 22:13 25:22 28:18	start 4:20 7:22 34:20 41:26	suggest 22:18 39:28 42:6
scoped 8:10	Sierra 5:19,21	starting 30:28	suggested 13:22 43:5
	significant 14:27 36:7	state 4:18,19 7:19 34:17	suitable 35:8
	similar 25:21 40:17 41:2	state's 11:8	supplement 27:8
	simply 15:3 27:11	stated 4:26	supply 30:7
	site 11:22 12:4 13:17		support 11:16,28 20:5 43:28
	sites 11:26 13:9,25		supporting 20:1 36:2
	situation 28:5		supports 32:27
			surcharge 31:28
			swap-out 17:5

switch 31:21	24:25 25:12 26:16,21 27:22 28:16,26 30:14 33:12 36:8	Union 5:22	6:1,5,10,16,23 8:12,15, 16 10:17 12:21 14:8,18 16:14,23 19:7,9 21:5, 11,17,19 22:1,4 23:9,22 24:7,10 29:3,7,9,20,22 31:23,24 32:22,23 33:16 35:3 36:17 37:9, 24 38:1,4,24 40:8 41:13 43:10 44:7,26 45:19,26 46:1,24 47:3 48:2,6,28
<hr/> T <hr/>		United 5:23	
table 20:7 29:1	today 2:15 3:23 29:15 34:5 41:25 49:6,16	unnecessarily 21:2	
talk 28:15	today's 3:12,14 6:12, 25 43:28 45:24 49:4,7	upcoming 3:21 7:3	
talking 16:27	tracking 39:12	upstream 12:10	
targets 3:1 9:7 11:11 20:17 21:26 22:11 26:23	tradable 11:2,13	urge 16:9	
Taxi 5:12,14 14:20 37:11,13 44:28 45:3	tradeable 48:16	USA 9:13	
TCPS 40:16 47:14	trading 20:18 46:10	usage 37:20	Wang's 32:14
Technologies 5:27 6:3 21:7 29:24 38:26 47:5	traffic 15:28	users 12:3 13:22,25 14:1	wanted 29:18 47:9
templates 40:2	transition 19:28 22:17	utilities 4:25 9:15 23:28 30:9,13 47:24 48:3	warrant 21:1
temptation 45:5	transportation 2:27 9:20 11:8 20:25	Utility 22:13	Waymo 6:6,9 32:24,25, 27 40:9,11,13 47:13 48:7,9
terms 26:22 35:23	travel 21:26 22:11	utilization 11:27	ways 19:22
Tesla 27:24	traveled 9:6 16:11	<hr/> V <hr/>	Weaver 5:7,8 12:23,24 14:9,10,11 36:19,20 44:9,10
text 18:7	treated 27:12 28:20	vast 15:8	web 4:17
thing 48:11	Tremaine 6:2	vehicle 9:6 13:18 14:28 15:4,10 16:10 17:19 21:26 22:11 28:7 33:6 36:10	webex 17:16 21:28
things 18:20 19:1 25:27	trip 22:19	vehicles 15:5,8,27 16:6 17:4,8,11 18:17 19:28 20:2 22:27 24:24,25,27 28:5 31:21	weekend 18:24
thinking 26:20	trips 22:20	venture 26:11	wishes 39:22
thought 39:5	true 17:12	verbal 23:6	work 16:7
thousands 16:5	turn 15:21 29:19	verification 39:13	work 16:7
threshold 47:12,16	turnover 11:16	versus 24:5	Workers 5:12,15 14:20 37:11,14 44:28 45:3
time 17:11,21 22:20 23:8 35:13,18 36:13 41:12 43:23 44:11 45:9	type 27:26	Vice 5:3	workshop 7:3 40:1 41:1,4,8
timeline 38:9 46:20	<hr/> U <hr/>	Vid 6:1 29:26 38:28 47:7	workshops 39:26
timing 46:15	Uber 5:26 6:3 9:13 21:6 27:6 29:24,27,28 31:8 38:25,28 39:2,18 41:2 47:4,7 48:13	view 24:16	worth 32:9,11
TMC 19:28	un-required 27:8	views 43:4	Wright 6:2
TNC 13:5 15:5,9 16:6,9 22:17,25 24:18 25:18 28:6 30:5 31:20 36:28 37:20 38:13	unacceptable 17:17, 26	VIRTUAL 2:1	written 14:4 23:6 44:13,15,19 48:18
TNC's 9:11 28:21 37:6	unconstitutional 25:17	VMT 11:11 37:21	wrong 27:9
TNC-GENERATED 14:25	understand 9:3 25:11	<hr/> W <hr/>	<hr/> Y <hr/>
TNCS 11:5 13:6 15:12, 20 17:3 21:24 22:9,18	understanding 20:7, 19 23:24 27:21		year 3:2
	unfettered 31:10		<hr/> Z <hr/>
		Wang 2:4,10 3:12,16 4:27 5:5,10,13,16,18,25	zero-emission 17:4