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R1902012

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement Senate Bill 1376 Requiring Transportation Network Companies to Provide Access for Persons with Disabilities, Including Wheelchair Users who need a Wheelchair Accessible Vehicle.

Rulemaking 19-02-012

E-MAIL RULING REQUESTING ADDITIONAL INFORMATION AND GRANTING EXTENSION OF TIME FOR TRACK 5A PROPOSALS

Dated June 13, 2022, at San Francisco, California.

/s/ DEBBIE CHIV

Debbie Chiv

Administrative Law Judge

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Subject: R.19-02-012_E-Mail Ruling Requesting Additional Information and Granting Extension of Time for Track 5A Proposals

To All Parties:

This email ruling addresses the below correspondence from Lyft, Inc. (Lyft) and San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, and San Francisco Mayor's Office on Disability (collectively, San Francisco). The e-mail ruling directs responses from Lyft and Uber Technologies, Inc. (Uber) and grants an extension of time to submit Track 5A proposals and comments.

Ordering Paragraph 3 of the April 11, 2022 Assigned Commissioner's Ruling does not require that a single trip request must be associated with only one type of cancellation. That said, we direct Lyft to submit a response as to: (1) how a single trip request on its platform may be subject to multiple cancellations, and (2) why a large number of its reported pre-scheduled trips contains multiple cancellations. Lyft shall file and serve a response within 7 days of the issuance of this ruling.

To foster transparency in the record, we also direct Uber to submit a response as to: (1) whether a single trip request on its platform may be subject to multiple cancellations, and (2) if so, how multiple cancellations may occur and how those trip requests/cancellations are reported to the Commission. Uber shall file and serve a response within 7 days of the issuance of this ruling.

With respect to San Francisco's second question, we note that response time is defined as "the time elapsed between when a WAV ride was requested and when the vehicle arrived," as established in Ordering Paragraph 2 of D.20-03-007.

San Francisco requests an extension of time to submit its additional Track 5A proposals, which are currently due on June 17, 2022. The extension request is GRANTED. Additional Track 5A proposals shall be submitted by June 30, 2022. The deadline for comments on proposals is also extended. Comments on proposals shall be submitted by July 14, 2022, with reply comments due July 26, 2022.

IT IS RULED that:

- (1) Lyft shall provide response as to: (1) how a single trip request on its platform may be subject to multiple cancellations, and (2) why a large number of its reported pre-scheduled trips contain multiple cancellations. Lyft shall file and serve a response within 7 days of the issuance of this ruling.
- (2) Uber shall provide a response as to: (1) whether a single trip request on its platform may be subject to multiple cancellations, and (2) if so, how multiple cancellations may occur and how those trip requests/cancellations are reported to the Commission. Uber shall file and serve a response within 7 days of the issuance of this ruling.
- (3) The request for an extension of time to submit additional Track 5A proposals is granted. Additional Track 5A proposals shall be submitted by June 30, 2022. Comments on proposals shall be submitted by July 14, 2022, and reply comments shall be submitted by July 26, 2022.

Docket Office shall formally file this ruling.

Debbie Chiv

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Subject: [EXTERNAL] RE: R.19-02-012 Track 5A Pre-Scheduled WAV & non-WAV Data and Request for Extension

Dear ALJs Chiv and Mason:

San Francisco appreciates the new context provided by Lyft, Inc. (“Lyft”) below. However, Lyft’s response raises additional questions about both Lyft’s data reporting and CPED’s instructions to TNCs:

1. San Francisco’s understanding was that a single trip request can only be cancelled once. It would be helpful for CPED staff to:
 - a. Confirm exactly what guidance was provided to Lyft; and
 - b. Explain in plain terms to all parties how it is possible to have multiple cancellations per single requested trip.
2. How does Lyft calculate the response time for trip requests with more than one cancellation? This is important to ascertain a) whether the Commission’s adopted definition of “response time” for a pre-scheduled trip is applicable to trip requests with multiple cancellations and b) whether parties would like to propose a revised definition of “response time” in their proposals in light of any new information.
3. The data reported by other TNCs does not contain evidence of counting multiple cancellations per single requested trip. If this was CPED’s direction to Lyft, was it also communicated to other TNCs?

San Francisco believes that all parties should have a common understanding of how data is reported and that the above questions should be resolved in a manner transparently accessible to all parties. Since data submitted in response to the ACR on Track 5A is intended to inform new proposals on Track 5A, and because all parties have an interest in a common understanding of facts, requirements, and procedures related to the Access for All program, we respectfully decline Lyft’s invitation to discuss the above questions with their counsel directly.

San Francisco respectfully requests that the CPUC extend the Additional Track 5A Proposals comment period by a minimum of 7 days after responses to these questions, and any necessary additional or reformed data, have been provided to the service list.



Sincerely,
Lillian Levy

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Subject: RE: R.19-02-012 Track 5A Pre-Scheduled WAV & non-WAV Data and Request for Extension

Dear Administrative Law Judges Chiv and Mason:

This email responds to the June 6, 2022 email from the San Francisco Municipal Transportation Agency, the San Francisco County Transportation Authority, and the San Francisco Mayor's Office on Disability (collectively, "San Francisco") below. In that email, San Francisco seeks "clarification" concerning the data submitted by Lyft, Inc. ("Lyft") on May 9 and May 27 in response to the April 11, 2022 Ruling on Track 5A Issues. Specifically, San Francisco posits that the figures for (b) completed trips + (c) not accepted trips + (d) trips canceled as no-show + (e) trips canceled by passenger + (f) trips canceled by driver "would be expected" to equal (a) total requested trips and observes that as to Lyft's data, (b) + (c)

+ (d) + (e) + (f) does not equal (a). Based upon that observation, San Francisco concludes that Lyft “underreported” the number of total requests.

San Francisco is not correct. In advance of May 9th, Lyft conferred with CPED staff to discuss its upcoming data submission and the proper presentation of that data. At that time, Lyft advised staff that a single requested Lyft trip may have multiple cancellations by a driver(s) and/or rider and requested guidance from staff concerning how this information should be reflected in Lyft’s May 9th data submission. Staff advised Lyft to include all cancellations per single requested trip. As a result, the equation (b)+(c)+(d)+(e)+(f) will not equal (a) because there are multiple cancellations reflected for a subset of Lyft’s trips. Thus, contrary to the assertion of San Francisco, the data submitted by Lyft is neither inaccurate nor flawed; but rather reflective of guidance received from CPED staff. Resubmission of Lyft’s data, therefore, is not warranted. Nor is there any reason to extend the period for additional comments.

As parties continue to review Lyft’s data in an effort to develop their proposals on the metrics that should be applied to WAV pre-scheduled trips, Lyft welcomes the opportunity to provide clarity and context around its data. If any party on the service list has specific questions regarding Lyft’s data, Lyft would encourage those parties to reach out to Lyft for clarification prior to contacting Your Honor. Any such parties may contact Janeé Weaver, Lyft’s Regulatory Counsel, at jweaver@lyft.com.

Best regards,
Dan



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Subject: R.19-02-012 Track 5A Pre-Scheduled WAV & non-WAV Data and Request for Extension

Dear ALJs Chiv and Mason:

The San Francisco Municipal Transportation Agency, the San Francisco County Transportation Authority, and the San Francisco Mayor's Office on Disability (collectively, "San Francisco") seek clarification on the following issues, outlined below, related to Additional Track 5A Proposals. We respectfully request a response from the ALJ.

In the Ruling on Track 5A Issues issued on April 11, 2022, the TNCs who are parties to this proceeding were ordered to submit data regarding pre-scheduled non-wheelchair accessible (WAV) trips and pre-scheduled WAV trips by May 9, 2022. Most TNCs submitted their data on this date. Lyft submitted an incomplete set of data on May 9, 2022 and submitted the remainder in a file titled LYFT_2021Q4_Prescheduled_WAV_Trips_12.csv on May 27, 2022.

In the Ruling on Track 5A Issues, the Commission ruled that:

A Transportation Network Company that is a party to this proceeding shall submit the following data for: (a) pre-scheduled non-wheelchair accessible vehicle (WAV) trips and (b) pre-scheduled WAV trips, if applicable:

- a. Response times for completed trips in deciles by geographic area and quarter; and
- b. Total pre-scheduled trips by geographic area and quarter:
 - (a) requested,
 - (b) completed,
 - (c) not accepted,
 - (d) cancelled as no-show,
 - (e) cancelled by passenger, and
 - (f) cancelled by driver,

It would be expected that (a) requested = (b) completed + (c) not accepted + (d) cancelled as no-show + (e) cancelled by passenger + (f) cancelled by driver.

While this is the case with all the data submitted by Uber and almost all of the other TNCs, this is not the case with the Lyft data. This is illustrated in tables below, using Lyft's reported Los Angeles data for Q3 as an example.

Table 1 shows that Lyft reported 375,534 pre-scheduled nonWAV requests, but the sum of data items (b) + (c) + (d) + (e) + (f) is 445,654 trip requests. This means Lyft's nonWAV trip requests were under-reported by 70,120, or 19%.

Table 1. Lyft nonWAV Trips Reported for Los Angeles County

TNC_Name	LYFT
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County	LOS ANGELES
Quarter	Q3 2021
(a) Presched_nonWAV_Requested	375,534
(b) Presched_nonWAV_TripsCompleted	274,220
(c) Presched_nonWAV_NotAccepted	419
(d) Presched_nonWAV_NoShow	26,546
(e) Presched_nonWAV_PsgrCancel	69,112
(f) Presched_nonWAV_DriverCancel	75,357
(b) + (c) + (d) + (e) + (f)	445,654
Difference	-70,120
% Difference	-19%

Table 2 shows that Lyft reported 355 pre-scheduled WAV requests, but the sum of data items (b) + (c) + (d) + (e) + (f) is 367 trip requests. This means Lyft's WAV trip requests were under-reported by 12, or 3%.

Table 2. Lyft WAV Trips Reported for Los Angeles County

TNC_Name	LYFT
County	LOS ANGELES
Quarter	Q3 2021
(a) Presched_WAV_Requested	355
(b) Presched_WAV_TripsCompleted	315
(c) Presched_WAV_NotAccepted	5
(d) Presched_WAV_NoShow	2
(e) Presched_WAV_PsgrCancel	33
(f) Presched_WAV_DriverCancel	12
(b) + (c) + (d) + (e) + (f)	367
Difference	-12
% Difference	-3%

In the Ruling on Track 5A Issues issued on April 11, 2022, the Commission stated that performance metrics for pre-scheduled WAV trips should be based on an evaluation of existing pre-scheduled WAV and non-WAV trip data.

San Francisco believes it would not be appropriate for the Commission to develop performance metrics, or base any proposals or decisions on inaccurate or flawed data. San Francisco respectfully requests that CPUC require Lyft to provide a revised data set to CPED and the

service list by June 9, 2022 and extend the Additional Track 5A Proposals comment period by an additional 7 days based on Lyft's responsiveness.

Sincerely,
Lillian Levy



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