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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Polices, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Service	R.25-08-013 (Filed August 28, 2025)

REPLY COMMENTS OF THE SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY IN RESPONSE TO THE E-MAIL RULING PROVIDING PREHEARING CONFERENCE QUESTIONS FOR PARTIES

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The San Francisco Municipal Transportation Agency ("SFMTA") submits these reply comments to the E-Mail Ruling Providing Prehearing Conference Questions for Parties sent by Administrative Law Judge Robert M. Mason III on January 6, 2026 in rulemaking R.25-08-013 to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Service. The California Public Utilities Commission ("Commission") asked permittees and others to comment on how autonomous vehicle ("AV") stoppages affected police, fire, and other first responder services during the power outages that started on December 20, 2025. These comments are filed by the SFMTA in close collaboration with and on behalf of the San Francisco Department of Emergency Management ("SFDEM"), the San Francisco Fire Department ("SFFD"), and the San Francisco Police Department ("SFPD"), (collectively, "San Francisco").

SUMMARY

San Francisco appreciates Commission efforts to take the December 20, 2025 power outage in San Francisco as an opportunity to learn so that industry, regulators, and affected public agencies can collaborate to achieve better responses in future emergency circumstances. San Francisco records cannot provide a comprehensive view of how AV challenges affected emergency response, but a combination of the stoppage event data shared by Waymo, reports of three events where AVs directly affected SFFD response, the long wait times and slow response experienced by 911 dispatchers (and the first responders they were supporting), combined with numerous press and social media reports of multi-vehicle stoppages affecting transit and traffic on city streets illustrate the importance of this learning opportunity. We respectfully request that the Commission make resilience and disaster planning an early focus of the Scoping Plan. In particular, the Commission should work with the Department of Motor Vehicles to require that AV permittees:

- Develop comprehensive emergency operations plans appropriate to the size of the permittee's driverless fleet and informed by demonstrated performance during emergency circumstances;
- Consult with affected public agencies about the content of draft emergency operations plans;

- Disclose information to local authorities who request such data about the number, duration, and location of stoppage events to support evaluation of draft emergency operations plans;
- Collaborate with public agencies as requested to test the adequacy of emergency operations plans in tabletop exercises and, where requested, applied on-road exercises; and
- Update emergency plans as necessary in response to expansion of fleets and/or service areas.

These requirements should scale proportionally with fleet size and service footprint, recognizing that systemic risk increases as vehicle volume increases.

DISCUSSION

1. The operational impact of AV stoppage events on first responders, public transit, and the transportation network during the December 20, 2025 power outages is difficult to measure; however, ensuring preparedness for future emergencies is more important than precise attribution.

SFDEM manages and activates the City's Emergency Operations Center, which serves as a city-wide incident support hub during activations, and oversees emergency and disaster planning for the City. It also manages the 911 public safety answering point for the City and dispatches emergency responders, including police, fire, paramedic, and SFMTA civil traffic control employees. Previous SFMTA comments have been informed by 911 dispatch operations. These comments are informed by SFDEM leaders managing the full range of SFDEM duties.

In Opening Comments, the SFMTA noted that San Francisco was still analyzing the December 20, 2025 power outage and was not in a position to draw final conclusions about the impacts of AV operations on emergency response or the overall transportation network. We present information available from City records below, but most San Francisco records are not created for the purpose of evaluating AV impacts. Rather, they are designed to support the City's core functions that are relevant to emergency operations—911 services, police and fire services, and transportation services. In addition, it can be difficult to distinguish the impacts from the power outage itself from the ways in which stranded AVs exacerbated demands on city workers and the public. For City purposes, the importance of the December 20, 2025 outage is not so much to draw detailed conclusions about how AV operations affected city operations *but to help all parties understand the risks that may arise from much larger driverless AV fleets, AV operations during much larger emergencies, or both larger driverless fleets and larger emergencies.* Operational friction during emergencies warrants structured

planning and mitigation. In other words, we provide the information below with a gaze focused on the future, not the past.

For a high-level summary, SFMTA has been able to identify 42 reported incidents involving AVs between the hours of 2 p.m. and midnight on Saturday, December 20, 2025. For context, SFMTA identified six reported incidents on the previous Saturday, December 13, 2025, a more typical weekend day. The December 20th incidents were identified using calls to 311 and 911, reports from SFFD leadership, and reports from transit operators to the SFMTA's Transportation Management Center. They do not include generalized complaints about AV behavior during the outage that did not identify a specific location. The reported incidents are unduplicated incidents, meaning that where three people call about the same incident (possibly reflecting the long duration of an event), they are represented as a single reported incident. However, as discussed below, the calls themselves add to the workload of emergency dispatchers and first responders.

The largest volume of reports occurred between the hours of 6:00 and 8:00 p.m.—after the time Waymo reports that they suspended service. Many, but not all, mention traffic lights. 20% of the 42 reported incidents refer to emergency services, and 25% refer to multiple AVs. In at least four incidents, first responders documented having relocated immobilized AVs that were interfering with emergency operations, transit service, or general traffic flow. This is one of the many factors that is likely significantly under-reported because the top priority for City staff in the context of an emergency is their core duties.

2. **Demand for emergency services increases during a power outage and City documentation of AV operations takes a back seat to providing direct services to the public. Accordingly, the information available below is drawn from operational records created in the course of delivering emergency services, not from records designed to evaluate AV performance.**

SFDEM: A power outage of the size and duration of the outage that began on December 20, 2025 by its nature generates a spike in demand for emergency services. The first city staff who experience this spike in demand are 911 dispatchers—the City's "first first-responders." Dispatchers both receive more calls from the public and must provide radio support as needed to the police, fire, and emergency medical responders who are dispatched to respond to those calls in the field. On December 20, 2025, 911 operators received approximately 40% more calls than they do on an average day (3978 compared with the average of 2785). The large majority of those calls did not involve AVs.

That said, the impact of disabled AVs on SFDEM dispatchers was significant. Between roughly 3:00 and 8:00 p.m,—more than two hours past Waymo's reported suspension of service at 5:55 p.m., numerous dispatchers placed a total of 31 calls to the Waymo first responder hotline for a total of two hours and thirty-six minutes of call time. While we cannot document this in detail, a large majority of this time was spent on hold; one SFDEM staff person remained on the Waymo first responder hotline for 53 minutes—most of that time on hold.[1] Under these circumstances, the Mayor reached out to Waymo directly.

SFFD: During a power outage, demands on the SFFD also increase. For example, firefighters are dispatched to rescue people stranded in elevators and to respond to building alarms that may be triggered by the interruption of electrical service. In the 24-hour period between 8:00 a.m. on December 20, 2025 and 8:00 a.m. on the following day, the SFFD received 801 calls—a 58% increase in calls for service over the daily average of 507 calls. SFFD dispatch records identify three incidents in which Waymo AVs had negative effects on SFFD operations:

- Firefighters were dispatched to the PG&E substation that caused the outage at 2:18 p.m. and the first unit arrived at the scene at 2:20 p.m. The initial response unit encountered a Waymo AV blocking traffic; in order to accommodate the arrival of additional responding units, firefighters had to allocate time to relocating the AV in place of their normally assigned duties.
- An ambulance was dispatched to a location near the intersection of Natoma Street and 7th Street at 5:14 p.m. and was stopped en route by a disabled Waymo AV. Staff first called the Waymo hotline at 5:28 p.m. and requested relocation of the AV. Staff called again seeking an ETA for a Waymo field team at 5:55 p.m. The ambulance arrival was delayed by 40 minutes.

[1] There have been previous activations of the City's Emergency Operations Center during which calls to the Waymo first responder hotline were not answered. For example, on June 8, 2025, between the hours of 3 and 7 a number of avoid the area messages were sent to AV companies, but 911dispatchers had to place five calls to the first responder hotline for a total of 38 minutes of call time without effective response from Waymo. This was the first occasion when a text from the Mayor was required before Waymo addressed the problem.

- Firefighters were dispatched to a working fire near the intersection of Saint Louis Alley and Grant Avenue at 5:32 p.m. The first unit arrived on scene within four minutes at 5:36 p.m. Avoid the area messages were sent to AV companies at both 5:32 and 5:37 p.m. An additional unit reporting to the scene was blocked by a Waymo AV. Dispatchers called the Waymo first responder line at 5:43 p.m. to request removal of a Waymo AV fully blocking Grant Avenue at Sacramento. As of 5:45 p.m., a dispatcher reported being on hold with Waymo; that dispatcher was still on hold at 5:53 p.m.—21minutes after the first avoid the area message was sent.

AVs have, on multiple occasions, interfered with SFFD emergency operations, both during active responses and while units are operating at the scene of an emergency incident. These interferences frequently require direct interaction between SFFD personnel and the autonomous vehicle, diverting personnel away from critical emergency response duties. In such situations, SFFD personnel may be required to approach the vehicle and attempt to direct it using hand signals. If these efforts are unsuccessful, personnel will then attempt to establish communication with the vehicle's operating company through the exterior speaker or microphone system. Should the company representative be unable to remotely reposition the vehicle, control of the vehicle may be released to SFFD personnel for the purpose of relocating it away from the incident area. These interactions can result in delayed emergency responses and/or the temporary reassignment of SFFD personnel from essential emergency operations, thereby impacting overall scene safety and operational efficiency.

While the December 20, 2025 power outage resulted from a fire, in other cases, fires may be *the result of another emergency or disaster*. San Francisco has a history of conflagration dating back to the 1906 earthquake. While the City has been planning and preparing to manage a major future earthquake for years, gas leaks that trigger structure fires, as well as destruction of key transportation infrastructure that affects emergency vehicle routes and evacuation routes, are all foreseeable events. AV permittees should be expected to develop plans for ensuring that they can rapidly move their vehicles to avoid interfering with emergency vehicles or, in the most serious cases, with evacuation routes.

SFMTA: During activations of the citywide Emergency Operations Center, the SFMTA manages the Transportation Department Operations Center ("DOC"). Key roles for the DOC include supporting evacuation, designating ingress and egress routes for emergency response vehicles and personnel, helping evacuate individuals who cannot evacuate themselves, providing transportation for City employees, including first responders, in their capacity as Disaster Service Workers, and working as quickly as possible to safely restore normal operations of the public transit system.

As discussed above, documentation from City systems is not generally designed to evaluate AV impacts but is designed to support delivery of services. During the December 20, 2025 power outage, the SFMTA experienced interruptions that resulted from AV interference. These are very significantly undercounted because of the importance of focus on service delivery rather than manual reporting.

Of the 42 reported incidents received by the SFMTA during the hours of 2:00 p.m. and midnight December 20, 2025: 32 came from calls to 311, seven came from calls to 911, three were reported by SFFD leadership, and three were reported by Muni operators. Yet seven incidents (16.7%) mention interference with transit vehicles. All seven incidents were cases where immobilized Waymo AVs blocked Muni vehicles. One Muni vehicle was delayed by 41 minutes. The SFMTA's Transportation Management Center reports that controllers verbally reported more transit related incidents than are reflected here because SFMTA employees prioritized service delivery over documentation.

a. Waymo's minimal voluntary data disclosure in opening comments is valuable; there is a strong public interest in disclosure of further details to support emergency planning and resilience.

We appreciate that Waymo opening comments included voluntarily disclosure of three key figures that provide a much greater understanding of the scope of the AV fleet problem, its impact on City employees and how members of the public perceived the problems facing the street network:

- 829 Waymo AVs were operating in the "outage area" (actual area not identified) in the hours between noon and 11 p.m. on December 20, 2025;

- Those Waymo AVs experienced 1,593 "stoppage events" where vehicles were stalled for more than two minutes; and
- That 96% of the stoppage events were resolved when the AVs proceeded in their travel and did not require manual retrieval.

Because of Waymo's claims for confidential treatment, San Francisco has no access to the detailed reporting to the CPUC that would inform us about the duration of these events, their location in relation to emergency infrastructure and emergency operations, or transit infrastructure and transit operations. We must assume that as many as 64 stoppage events (the remaining 4%) required manual retrieval and thus had the kind of extended durations that were widely reported in media and social media.[2]

Waymo's Opening comments note that evaluating stoppage events would require expert manual review. Collaborative review of this data by City staff and the relevant AV permittees would help the industry and the City identify patterns that may call for close attention in disaster planning (such as AV depot locations in close proximity to critical city resources, recurring patterns, etc.). Tabletop disaster planning exercises are frequently developed based on after action review of events that have already occurred. There is a strong public interest in disclosure of this data to support the most effective resiliency and disaster planning.

3. The Commission should make disaster resilience and planning by AV permittees a high priority for early consideration in this proceeding.

Whether framed as "long tail events," "edge cases," or "novel challenges," we know that widespread power and communications outages, earthquakes and other disasters will happen. Regulators should require that permittees plan for them, consult affected emergency response agencies about the adequacy of those plans, and regularly collaborate with public agencies to test the adequacy of those plans.

[2] The reported incidents described in these comments do not include many others that were reported in the press and social media, some of which involved long duration, many vehicles, or both, including incidents on subsequent days when outages and stoppage events continued. See for example Mission Local article *"Waymo halts service during massive S.F. blackout after causing traffic jams"*; accessed February 13, 2026: https://missionlocal.org/2025/12/sf-waymo-halts-service-blackout.

San Francisco anticipates several additional companies operating AVs on public roads. In recent years, we have found that collaboration with local agencies is most robust when a permitting decision is pending. We ask regulators to put their weight behind the importance of this planning. AV permittee collaboration with local emergency planners should be mandatory, not discretionary, and state regulators (both DMV and CPUC) should actively collaborate with local agencies to ensure that permittee resilience and disaster planning is adequate in relation to the size of a permittee's fleet and other factors that may affect resilience

4. The Commission should reject industry confidentiality claims as to "stoppage events" that take place on public roads and take all steps necessary to prevent years of litigation over arguments that have been litigated by transportation network companies ("TNCs") for more than a decade.

There is a strong public interest in the basic facts of AV stoppage events, including the number, duration, location, and other factors relevant to the delivery of essential city services. These facts should be made available to the public to enable a host of critical uses,[3] chief among them local agencies' ability to plan for and respond to emergencies and other disasters. As highlighted above, stoppage events complicate emergency response and management, creating real-world impacts for public safety on local streets. The necessity of local government understanding of these events is far from hypothetical, touching the core of cities' and counties' duties to public health, safety, and welfare.

As stated in our Opening Comments, the Commission should address AV claims of confidential treatment head-on by adding development of confidentiality matrix to govern the disclosure of AV data that should be presumptively public to the scope of this proceeding.[4] But, while the need for efficient disclosure of all data categories is important, it is especially acute for stoppage

[3] Opening Comments of the SFMTA on the Order Instituting Rulemaking to Establish Policies, Processes, and Rules Regarding AV Passenger Transportation Service, filed on October 31, 2025 ("Opening Comments"), at 10.

[4] *Id*.

event data due to the impact on emergency operations. For that reason, the SFMTA asks that the CPUC consider (and reject) industry confidentiality claims as to "stoppage events" as soon possible.

Dated: February 13, 2026

Respectfully submitted,

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