



FILED
03/27/26
04:59 PM
C2603035

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Complainant, vs. Defendant.	Case (C.) _____
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COMPLAINANT	DEFENDANT

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A)

COMPLAINANT(S)
vs.

(B)

DEFENDANT(S)
(Include Utility "U-Number," if known)

(for Commission use only)

(C)

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?
 YES NO

Has staff responded to your complaint?
 YES NO

Did you appeal to the Consumer Affairs Manager?
 YES NO

Do you have money on deposit with the Commission?
 YES NO
 Amount \$ _____

Is your service now disconnected?
 YES NO

COMPLAINT

(D)
 The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number

respectfully shows that:

(E)
 Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

(G) Scoping Memo Information (Rule 4.2[a])

(1) The proposed category for the Complaint is (check one):

- adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
- ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)? YES NO

(3) Regular Complaint Expedited Complaint (Rule 4.6)

(4) The issues to be considered are

(Example: The utility should refund the overbilled amount of \$78.00):

(5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.
Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09): _____

Hearing (Example: 7/1/09): _____

Explain here if you propose a schedule different from the above guidelines.

(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

(I)

OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

(J)

Dated _____, California, this _____ day of _____, _____
(City) (date) (month) (year)

/s/ Scott A. Kronland, Attorney for Complainants

Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

(K)

REPRESENTATIVE'S INFORMATION:

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: _____

Address: _____

Telephone Number: _____

E-mail: _____

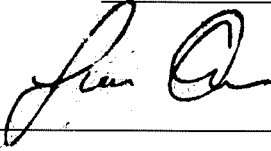
Signature: /s/ Scott A. Kronland

VERIFICATION

I am an officer of Complainant SEIU California State Council and am authorized to make this verification on its behalf. The statements in the foregoing Complaint are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 2026 at Sacramento, California.



Signature of Officer

Tia Orr

Name

Executive Director

Title

VERIFICATION

I am an officer of Complainant SEIU521 and am authorized to make this verification on its behalf. The statements in the foregoing Complaint are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 26, 2026 at San Jose, California.



Signature of Officer

Riko Mendez

Name

Chief Elected Officer

Title

VERIFICATION

I am an officer of Complainant SEIU Local 721 and am authorized to make this verification on its behalf. The statements in the foregoing Complaint are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 2026 at Los Angeles, California.

David Green

Signature of Officer

David Green

Name

President/Executive Director

Title

VERIFICATION

I am an officer of Complainant SEIU Local 1021 and am authorized to make this verification on its behalf. The statements in the foregoing Complaint are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 26, 2026 at Oakland, California.



A handwritten signature in black ink, consisting of a stylized 'T' inside a circle followed by a cursive name, written over a horizontal line.

Signature of Officer

Theresa Rutherford

Name

Presidentt

Title

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

March 24, 2026

Date

Tia Orr

Print your name

For SEIU California State Council

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Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

Date

Print your name

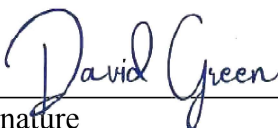
For SEIU Local 521

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

03/24/2026

Date

David Green

Print your name

For SEIU Local 721

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

A handwritten signature in black ink, appearing to read 'Theresa Rutherford', is written over a horizontal line. The first letter 'T' is circled in blue ink.

Signature

3/26/2026

Date

Theresa Rutherford

Print your name

For SEIU Local 1021

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Service Employees International Union,
California State Council; Service
Employees International Union, Local 521;
Service Employees International Union,
Local 721; Service Employees International
Union, Local 1021,

Complainants,

v.

Waymo LLC,

Defendant.

Docket No. _____

APPENDIX TO COMPLAINT

Scott A. Kronland
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Email: skronland@altber.com
mlowe@altber.com

Attorneys for Complainants

APPENDIX TO COMPLAINT

I. Explain fully and clearly the details of your complaint.

Waymo has operated and continues to operate in violation of the Commission's Decision Authorizing Deployment of Drivered and Driverless Autonomous Vehicle Passenger Service (D.20-11-046), which prohibits Waymo from transporting unaccompanied minors in its driverless vehicles. The Commission's decision is unambiguous: "No one under 18 may travel unaccompanied, regardless of whoever chartered the vehicle." Nevertheless, Waymo's services are routinely used to transport unaccompanied minors in violation of the Commission's prohibition on transporting unaccompanied minors. Waymo has acknowledged these violations yet has not been penalized and has not provided assurances that, in the future, its services will be provided in compliance with its permit.

Like many technology companies, Waymo apparently believes that it is better to ask for forgiveness than permission when dealing with government regulators. The Commission should not allow its orders to be flouted, particularly when they concern the protection of minors.

A. Parties

Complainants are Service Employees International Union, California State Council ("SEIU California"); Service Employees International Union, Local 521 ("SEIU Local 521"), Service Employees International Union, Local 721 ("SEIU Local 721") and Service Employees International Union, Local 1021 ("SEIU Local 1021").

SEIU Local 521, SEIU Local 721, and SEIU Local 1021 together represent hundreds of thousands of public, non-profit, and private sector workers across California, and together are affiliated with the California Gig Workers Union ("CGWU"). SEIU Local 521, SEIU Local 721, and SEIU Local 1021 are labor organizations within the meaning of Labor Code § 1117. *See* Rule 4.1. SEIU California is a labor federation comprising SEIU local unions that represent more

than 750,000 workers across California. SEIU California’s mission is to increase economic fairness for working people, ensure high quality services and create a well-funded, equitable, just and prosperous California.

Defendant Waymo LLC is an autonomous driving technology company participating in the Commission’s Drivered and Driverless Autonomous Vehicle Passenger Service Deployment Program, authorized by D.20-11-046 (as modified by D.21-05-17).

B. Background

The Commission’s Decision (D.20-11-046) expressly considered “whether the Commission should authorize permit holders to carry minors.” Section 4.7. The Commission explained that it “currently prohibits the transport of unaccompanied minors in autonomous vehicle passenger service” and ruled that “[t]his prohibition will continue.” Section 4.7.2. In its Decision, the Commission acknowledged that transportation network companies (TNCs) must comply with additional requirements to carry unaccompanied minors. Section 4.5.2. TNC drivers who transport unaccompanied minors in violation of Commission-adopted rules face suspension or deactivation.¹ Waymo has not been held to the same standard. Operating under permits pursuant to D.20-11-046, Waymo has rapidly expanded its operations in both the San Francisco and Los Angeles metropolitan areas. Waymo began its commercial operations in San Francisco in 2022 and began expanding its services in August 2023.² Waymo began its

¹ Raiser-CA, LLC (i.e., Uber); Plan Regarding Unaccompanied Minors, June 6, 2026, https://webtraining.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/licensing/transportation_network_companies/rasier-ca-llc-plan-regarding-unaccompanied-minors-june-6-2016-.pdf (last visited March 5, 2026) (Appendix, Ex. 1); Re: Report of Lyft, Inc. Regarding Unaccompanied Minors, June 6, 2016, https://webtraining.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/licensing/transportation_network_companies/2016-06-06-response-re-unaccompanied-minors-1-.pdf (last visited March 5, 2026) (Appendix, Ex. 2).

² The Waymo Team, *Waymo’s next chapter in San Francisco* (Aug. 11, 2023), <https://waymo.com/blog/2023/08/waymos-next-chapter-in-san-francisco> (last visited Feb. 17, 2026) (Appendix, Ex. 3).

commercial operations in Los Angeles in March 2024³ and expanded its services in November 2024.⁴

As Waymo’s operations have grown, so have concerns about its safety record, particularly with regard to complying with protections in place for children. Waymo vehicles have been documented illegally passing stopped school buses on more than 20 occasions in Austin, Texas, with additional incidents in Atlanta, Georgia. Both the National Highway Traffic Safety Administration (NHTSA) and the National Transportation Safety Board (NTSB) have opened investigations into these incidents.⁵ On January 23, 2026, a Waymo robotaxi struck a child near an elementary school in Santa Monica during morning drop-off hours. The vehicle made contact with the young child, who sustained minor injuries.⁶

Waymo has never obtained approval from the Commission to transport unaccompanied minors in this state, yet its practice of ferrying unaccompanied minors has become routine. On January 5, 2026, the *New York Times* published an article, “The Robot Cars Have Come for the Kids,” documenting Waymo’s routine practice of ferrying unaccompanied minors across Los Angeles in autonomous vehicles.⁷ Waymo’s practice of transporting unaccompanied minors in

³ The Waymo Team, *Scaling Waymo One safely across four cities this year* (Mar. 13, 2024), <https://waymo.com/blog/2024/03/scaling-waymo-one-safely-across-four-cities-this-year> (last visited Feb. 17, 2026) (Appendix, Ex. 4).

⁴ The Waymo Team, *Waymo One is now open to all in Los Angeles* (Nov. 12, 2024), <https://waymo.com/blog/2024/11/waymo-one-open-to-all-in-los-angeles> (last visited Feb. 17, 2026) (Appendix, Ex. 5); Jennifer Elias, *Waymo opens robotaxi service to anyone in Los Angeles, marking its largest expansion yet.*, CNBC, Nov. 12, 2024, <https://www.cnbc.com/2024/11/12/waymo-opens-robotaxi-service-to-anyone-in-los-angeles.html> (last visited Feb. 17, 2026) (Appendix, Ex. 6).

⁵ Sean O’Kane, *Waymo probed by National Transportation Safety Board over illegal school bus behavior*, TechCrunch, Jan. 23, 2026, <https://techcrunch.com/2026/01/23/waymo-probed-by-national-transportation-safety-board-over-illegal-school-bus-behavior/> (last visited Feb. 17, 2026) (Appendix, Ex. 7).

⁶ Caroline Petrow-Cohen & Salvador Hernandez, *Waymo under scrutiny after hitting child near Santa Monica elementary school*, L.A. Times, Jan. 29, 2026, <https://www.latimes.com/business/story/2026-01-29/waymo-under-scrutiny-after-hitting-child-near-santa-monica-elementary-school> (last visited Feb. 17, 2026) (Appendix, Ex. 8).

⁷ Corina Knoll, *The Robot Cars Have Come for the Kids*, N.Y. Times, Jan. 5, 2026, <https://www.nytimes.com/2026/01/05/us/waymo-kids-los-angeles.html> (last visited Feb. 17, 2026) (Appendix, Ex. 9).

violation of the Commission’s requirements is also routine in San Francisco. An article published in the *San Francisco Chronicle* on January 20, 2026, reported that “it’s become totally acceptable to call a Waymo for your teen,” that parents are “relying on robotaxis to transport their unaccompanied children,” and that “parents have found they’re unlikely to get caught.”⁸ Waymo’s response was not to deny the allegations but to suggest that the current rules do not matter: “According to a Waymo spokeswoman, the company may seek to add accounts for teenagers in California as the state’s rules evolve.”⁹

On January 9, 2026, Waymo acknowledged in a Commission proceeding that Waymo is “aware” that adults are retaining Waymo to transport unaccompanied minors.¹⁰ The Waymo representative blamed adults who book rides for unchaperoned minors for breaching Waymo’s terms of service.¹¹ Waymo did not—and has not in the months since—provide any assurances that Waymo will discover such violations, suspend the accounts, and otherwise guarantee that Waymo will operate in accordance with its permit.

Waymo’s response to allegations that it is operating in violation of its permit has been to request that the Commission change Waymo’s permit to authorize the transportation of unaccompanied minors. Waymo even suggests that the Commission do so without requiring that operators submit training materials and without a minimum age requirement.¹² These positions are revealing. Like many technology companies, Waymo views government regulations as just

⁸ Rachel Swan, *Parents are letting teens ride in Waymos without an adult. That poses a dilemma for the company*, S.F. Chronicle, Jan. 20, 2026, <https://www.sfchronicle.com/sf/article/parents-teens-waymo-without-adult-21297207.php> (last visited Feb. 17, 2026) (Appendix, Ex. 10).

⁹ *Supra*, note 8.

¹⁰ *Supra*, note 9.

¹¹ *Id.*

¹² Response of Waymo LLC to Jan. 12, 2026 ALJ’s E-mail Ruling Regarding Questions from Jan. 6, 2026 E-mail Ruling, R.25-08-013, at 10 (Jan. 30, 2026), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M597/K305/597305739.PDF> (last visited Mar. 2, 2026) (Appendix, Ex. 11).

suggestions and expects regulators to look the other way as to violations and adapt their regulations to whatever Waymo decides is best. This raises the question of whether Waymo can be trusted to have a permit at all.

Furthermore, in the Commission's Rulemaking to Establish Policies, Processes, and Rules Regarding Autonomous Vehicle Passenger Transportation Service (R.26-08-013), Waymo has objected to any inquiry about its past and current transportation of unaccompanied minors in violation of its permit, stating:

[A] rulemaking is not the proper forum for pursuing enforcement or to hold an evidentiary hearing to adjudicate alleged violations by a single operator. To the extent the Commission seeks to investigate and enforce potential violations of its requirements, the Commission can do so through its well-established mechanisms and procedures.¹³

As such, the Commission must use its formal complaint procedure to hold Waymo accountable for operating in flagrant violation of its permit and potentially putting minors at risk. Waymo has tools at its disposal to confirm that account holders are within the autonomous vehicle and that the autonomous vehicle is not transporting an unaccompanied minor. If Waymo cannot operate in accordance with its permit, then Waymo should not be operating.

C. The Injury Complained Of

Complainants' members include California TNC drivers who, because of the Commission's rules, are currently unable to transport unaccompanied minors. Complainants' members would face deactivation or suspension for transporting unaccompanied minors and are therefore foreclosed from this market. Waymo's transportation of unaccompanied minors causes competitive injury to complainants' members because Waymo is capturing a potentially lucrative

¹³ Reply Comments of Waymo LLC on the January 12, 2026 ALJ's E-mail Regarding Questions from Jan. 6, 2026 E-mail Ruling, R.25-08-013, at 4 (Feb. 13, 2026), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M599/K152/599152738.PDF> (last visited Mar. 2, 2026) (Appendix, Ex. 12).

market and complainants' members cannot compete in that market. Complainants are informed and believe that if Waymo continues to transport teenagers in California through its illegal activity, Waymo will gain an advantage in that market over competitors who follow the law. Waymo is also obtaining a competitive advantage over complainants' members because Waymo is accessing a revenue stream that complainants' members cannot access and is able to use that revenue stream to grow its business.

Waymo's violations also injure complainants' members by placing their safety at risk. Complainants' members include California TNC drivers, workers at California public schools, and users of California's public roads. Complainants are informed and believe that Waymo's use of autonomous vehicles to transport unaccompanied minors without any safety protocols poses a risk to the safety of TNC drivers, workers at California public schools, and users of California public roads. Unaccompanied minors may be unable to adequately respond to trip disruptions, obstructions, or other unplanned events, and unaccompanied minors may unsafely enter or exit vehicles or otherwise interfere with the safe operation of traffic. SEIU Local 1021 members who serve as crossing guards have already experienced "near misses" with Waymo vehicles while working school crosswalks and it is likely that unaccompanied minors would be using Waymo vehicles to travel to and from schools. Waymo vehicles have also stopped in the middle of public streets, where it would be unsafe for a passenger to exit the vehicle. An unaccompanied minor who exits the vehicle in traffic could place TNC drivers and other users of California public roads at risk. An unaccompanied minor who is unable to coordinate with Waymo or law enforcement to immediately address a Waymo vehicle breakdown or stoppage, such as occurred during a blackout in San Francisco, may delay the removal of an obstruction to normal vehicle traffic, thereby harming TNC drivers and other users of the public roads.

Complainants' members also include tens or hundreds of thousands of parents of minor children. Complainants are informed and believe that minor children face increased safety risks because of Waymo's violation of its permit. Minors are unable to provide meaningful consent to the risks of traveling unaccompanied in autonomous vehicles. Complainants are informed and believe that, if Waymo continues to provide services to unaccompanied minors, there is a risk that more minor children, including some of complainants' members' children, will be tempted to use Waymo's services without a parent's knowledge, thereby putting those children's safety at risk. Part of the reason for barring autonomous vehicle operators from transporting unaccompanied minors is that minors do not always exercise good judgment. Complainants are informed and believe that, just as minors get older friends to buy them alcohol or cigarettes, minors will find a way to use Waymo autonomous vehicles to travel without an adult in the vehicle if Waymo continues to transport unaccompanied minors in violation of its permit.

D. The Defendant's Violations

Waymo is operating in violation of D.20-11-046, Ordering Paragraph 7k, which requires that Waymo "[e]nsure that the service is available only to be chartered by adults 18 years and older, and provide proof of such assurance to the Commission with their Transportation Charter-Party Carrier permit application and upon request anytime thereafter." The Decision clearly states: "The Commission currently prohibits the transport of unaccompanied minors in autonomous vehicle passenger service." Section 4.7.2. "No one under 18 may travel unaccompanied, regardless of whoever chartered the vehicle." Section 5.

Waymo is also operating in violation of its own Passenger Safety Plan, adopted in accordance with D.20-11-046 (as modified by D.21-05-017). Waymo's Passenger Safety Plan provides: "Account holders are also required to confirm that they are at least 18 years of age to

ride with Waymo (riders under 18 must be accompanied by an adult account holder) in California.”¹⁴ The Commission’s Decision provides that one purpose of the Passenger Safety Plan is to “establish a public document against which the applicant’s actions will be compared.” Section 4.7.2. “[I]f an entity authorized to participate in the driverless deployment program intends to changes [sic] its operations in a way that would materially affect the approaches outlined in its Passenger Safety Plan, that entity should provide . . . an updated Passenger Safety Plan by way of Tier 2 Advice Letter.” Ordering Paragraph 20; Section 4.24. Waymo’s most recently submitted Passenger Safety Plan, still under consideration, similarly provides: “Account holders are also required to confirm that they are at least 18 years of age to ride with Waymo (riders under 18 must be accompanied by an adult account holder) in California.”¹⁵ Waymo is also operating in violation of D.20-11-046 by failing to update its Passenger Safety Plan in accordance with its operations.

II. The issues to be considered.

1. Did the Defendant operate in violation of D.20-11-046 by transporting unaccompanied minors in California?
2. Has the Defendant taken the necessary precautions, awareness measures, or accountability measures to ensure that unaccompanied minors are not being transported in violation of Defendant’s permit?

¹⁴ Cal. Pub. Utils. Comm’n, Waymo LLC, Advice Letter No. 0003 (Tier 2), Attachment C, at 10 (Mar. 26, 2025), https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/consumer-protection-and-enforcement-division/documents/tlab/av-programs/tcp0038152a-waymo-al-0003_a1b.pdf (last visited Mar. 10, 2026) (Appendix, Ex. 13).

¹⁵ Cal. Pub. Utils. Comm’n, Waymo LLC, Advice Letter No. 0004 (Tier 2), Attachment C, at 12 (Jan. 28, 2026), <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/consumer-protection-and-enforcement-division/documents/tlab/av-programs/tcp0038152a-waymo-al-0004.pdf> (last visited Mar. 10, 2026) (Appendix, Ex. 14); *id.* at 34 (“We require Waymo account holders in California to be at least 18 years of age, but minors who are accompanied by an adult account holder are welcome to ride.”).

3. What enforcement mechanisms, such as financial penalties or suspension of permits, are necessary to prevent future violations and ensure operation in compliance with permits?

III. State clearly the exact relief desired.

1. Pursuant to Public Utilities Code §§ 2107, 2108, 5411, impose financial penalties on Waymo for its widespread and repeated violations of D.20-11-046.
2. Pursuant to Public Utilities Code §§ 2107, 2108, 5411, establish a penalty framework for each violation of D.20-11-046 based on transportation of unaccompanied minors moving forward, to be set at \$5,000 per violation.
3. Pursuant to Public Utilities Code §§ 701 and 5378(a), impose additional requirements on Waymo's operation of driverless autonomous vehicle passenger services, including:
 - a. Implementing age verification and account holder verification processes to ensure all passenger service rides include an adult 18 years or older; and
 - b. Requiring regular reports by Waymo on the steps it is taking to ensure that its autonomous vehicles are not transporting unaccompanied minors, including notification of account holders that their accounts will be suspended if they attempt to use the vehicles to transport unaccompanied minors.
4. Pursuant to Public Utilities Code § 5378(a), suspend Waymo's permit to operate in the State unless and until Waymo has provided sufficient assurances that Waymo can and will operate in California in full compliance with its permit.
5. Require Defendant to pay Complainants' attorney's fees and costs for this matter.
6. Grant any other and further relief that the Commission determines to be just and reasonable.

Dated: March 27, 2026

Respectfully submitted,

Scott A. Kronland
Marisa C. Lowe
ALTSHULER BERZON LLP

By: /s/ Scott A. Kronland

Attorneys for Complainants