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

Order Instituting Rulemaking on Regulations Relating to Passenger Carriers, Ridesharing, and New Online-Enabled Transportation Services.	Rulemaking 12-12-011

PETITION OF UBER TECHNOLOGIES, INC. AND LYFT, INC. FOR MODIFICATION OF RESOLUTION TL-19129 ADOPTING GENERAL ORDER 157-E AND DECISION 16-04-041

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Dated: July 10, 2026

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I. INTRODUCTION

Pursuant to Rule 16.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules") and Resolution TEB-001,[1] Uber Technologies, Inc. ("Uber") and Lyft, Inc. ("Lyft") (together, the "Joint Petitioners") submit this joint petition to modify Resolution TL-19129 adopting General Order 157-E ("GO 157-E") and Decision ("D.") 16-04-041.[2] For the reasons described herein, Joint Petitioners seek to amend Section 4.05 of GO 157-E and Ordering Paragraphs 1 and 2 of D.16-04-041 to require that all transportation network companies ("TNCs") ensure that vehicles on their respective platforms undergo a 19-point vehicle inspection by a facility licensed by the California Bureau of Automotive Repair ("BAR") upon accruing 40,000 miles while engaged on a TNC's platform ("in-app")[3] or every 12 months, whichever occurs first, following the initial inspection that occurred prior to that vehicle commencing operation on the TNC's platform, undergoes subsequent 19-point vehicle

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[1] *See* Resolution TEB-001, Attachment A, Administrative Consent Order, § IV.G.7 at 11.
[2] Pursuant to Rule 1.8(d), counsel for Lyft authorized Davis Wright Tremaine LLP to sign and file this petition on behalf of Joint Petitioners.
[3] For clarity, this would include all three periods typically associated with a driver in-app: Period 1, during which the driver has the app open and is available for hire; Period 2, during which the driver has accepted a request and is traveling to the passenger; and Period 3, during which the passenger is in the vehicle.

inspections by a facility. Modifying the existing requirement to a 40,000-mile in-app threshold will enhance TNC vehicle inspection compliance programs and facilitate the Commission's ongoing oversight with respect to TNC vehicle inspections, in promotion of public safety.

II. STANDARD OF REVIEW

The Commission may exercise its authority to "rescind, alter, or amend any order or decision,"[4] including through a Rule 16.4(a) petition for modification, which "asks the Commission to make changes to an issued decision."[5] Rule 16.4 requires the petitioner to state the justification for the requested relief; provide a declaration or affidavit supporting allegations of new or changed facts; propose specific wording to implement requested modifications; and explain any delay if the petitioner files more than one year after the decision's effective date.[6]

The Commission has broad authority to grant petitions for modification,[7] which should be granted upon a "persuasive indication" that the Commission should "make a different decision" than that previously made.[8] The Commission may modify a decision, for example, when "(1) new facts are brought to the attention of the Commission, (2) conditions have undergone a material change, or (3) the Commission proceeded on a basic misconception of law

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[4] Pub. Util. Code § 1708.
[5] Rule 16.4(a).
[6] *See* CPUC Rule 16.4; Pub. Util. Code § 1701, 1708.
[7] *See In re Application of Exposition Metro Line Constr. Auth.*, D.09-02-032, 2009 Cal. PUC LEXIS 74, *13 (Feb. 20, 2009); *see also*, Pub. Util. Code § 1708.
[8] *In re Order Instituting Rulemaking for Adoption of Amend. to Gen. Order and Proc. to Implement Franchise Renewal Provisions of Digital Infrastructure and Video Competition Act of 2006*, D.17-12-006, 2017 Cal. PUC LEXIS 578, *15 (Dec. 14, 2017) (internal citations omitted).

or fact."[9] Beyond "changed circumstances,"[10] the Commission may and should grant petitions where fundamental inequities exist[11] or critical policy considerations went unnoticed.[12]

III. THE CURRENT VEHICLE INSPECTION REQUIREMENT

Currently, Section 4.05 of GO 157-E states that "[a]ll charter-party carriers, including TNCs, shall ensure that every vehicle . . . utilized in its operations undergoes a 19-point vehicle inspection at a facility licensed by the California Bureau of Automotive Repair prior to initial operation and every 12 months or 50,000 miles thereafter." Similarly, Ordering Paragraph 1 of D.16-04-041 states that the initial compliance obligation is ongoing, and that "[a]ll [] TCP vehicles, including [] TNCs, shall be inspected every 12 months or 50,000 miles thereafter, whichever occurs first." The Transportation Enforcement Branch of the Consumer Protection and Enforcement Division of the Commission ("TEB") has interpreted this current vehicle inspection rule to require that a vehicle operating on TNCs platforms must be inspected by a BAR facility either annually or every 50,000 miles that it travels—not limited to the miles that it travels in-app—whichever occurs first ("Current Vehicle Inspection Requirement").

IV. CHANGED CIRCUMSTANCES WARRANT THE MODIFICATION OF GENERAL ORDER 157-E, § 4.05

TNCs do not rely on a fleet of commercially dedicated vehicles that they own and operate.[13] Instead, individuals utilize their personal vehicles on a flexible basis to match with

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[9] D.17-12-006, 2017 Cal. PUC LEXIS at *15 (internal citations omitted).

[10] *See* D.09-02-032, 2009 Cal. PUC LEXIS at *12 (discussing reasons to grant petitions for modification).

[11] *See S. Cal. Edison Co. Petition for Modification of Res. E-3843*, D.04-09-004, 2004 Cal. PUC LEXIS 444, *1 (Sep. 2, 2004).

[12] *See S. Cal. Edison Co. Application for Rehearing of Res. G-3062*, D.94-01-049, 1994 Cal. PUC LEXIS 57, *2-3 (Jan. 19, 1994) (emphasis omitted).

[13] *See* Attachment B, Declaration of Ashley Fillmore; Attachment C, Declaration of Janée Weaver (together, "TNC Declarations"). Other non-TNC charter party carriers do own and operate a fleet of commercially dedicated vehicles and so this Petition does not seek to revise the Current Vehicle Inspection Requirement for those non-TNC charter party carriers.

TNC customers seeking a ride through a TNC platform.[14] Accordingly, a driver on a TNC's platform might drop their kids off at school, turn on the Uber or Lyft App to give rides for a few hours, and then log off to run personal errands. Additionally, a driver could decide to take an extended break from providing trips on the TNC platform during which time the vehicle could be accruing mileage with no ability for the TNC to track those miles in real time.

This makes it impossible for Uber, or any TNC whose business model fundamentally relies on individuals utilizing their personal vehicles on a flexible basis, to determine precisely when a vehicle that operates on its platform reaches the relevant mileage threshold and despite "the substantial efforts Uber has undertaken in recent years to enhance its vehicle tracking to reduce safety risks to the public."[15] Accordingly, these data limitations, inherent to the TNC model, affect Uber's and Lyft's (and any other TNC's) ability to strictly comply with the Current Vehicle Inspection Requirement.[16]

TNCs—including Uber and Lyft—raised the structural impossibility for TNCs to accurately determine and track total accumulated mileage of vehicles operating on their platforms that is necessary to achieve strict compliance with the Current Vehicle Inspection Requirement in the rulemaking that culminated with D.16-04-041. Although the Commission adopted the Current Vehicle Inspection Requirement notwithstanding those concerns, TNCs have made substantial and good-faith efforts to meet the Current Vehicle Inspection Requirement as discussed in Resolution TEB-001. While the technical challenges of the current requirement are not new, only recently has TEB made clear that TNCs' substantial compliance efforts up until 2019 to 2022 are not sufficient.[17]

[14] *See* TNC Declarations.
[15] Resolution TEB-001 at 14.
[16] *See* TNC Declarations.
[17] *Id.*

While industry practices have remained consistent for a decade, TEB's recent transition toward a strict-compliance enforcement model with respect to vehicle inspection requirements represents a fundamental shift.[18] This move away from long-standing administrative norms constitutes a material change in circumstances, necessitating this Petition to ensure the Commission's requirements align with current oversight realities.[19] Uber's discussions with TEB, which led to Resolution TEB-001, and Lyft's ongoing discussions with TEB staff, have made it clear that in order to address this changed circumstance and serve the public interest, the best course of action is to petition to modify the Current Vehicle Inspection Requirement.[20]

V. GRANTING THE PETITION WOULD BENEFIT THE PUBLIC BY ENSURING TNCS WILL MEET THE COMMISSION'S SAFETY STANDARDS

Granting the petition advances the public interest by strengthening regulatory oversight and encouraging continued improvements to vehicle inspection compliance practices. First, a 40,000 mile in-app threshold meets the spirit of the Current Vehicle Inspection Requirement by setting a lower in-app threshold than the current 50,000 mile threshold in order to account for miles that occur when TNCs are not able to track the vehicles. Second, the revised rule ensures that a TNC is able to successfully collect the data necessary to strictly meet the ongoing vehicle inspection requirements of GO 157-E and D.16-04-041. Thus, granting this Petition would allow the Commission to establish a clearer compliance framework that enables improved Commission oversight vis-à-vis TNC vehicle inspections and enhanced public safety.

[18] *Id.*
[19] *Id.*
[20] *Id.*

VI. CONCLUSION

For these reasons, the Commission should modify Resolution TL-19129 and D.16-04-041 by revising Section 4.05 of GO 157-E and Ordering Paragraphs 1 and 2 of D.16-04-041 to require that TNCs ensure that following the initial inspection that occurred prior to a vehicle commencing operations on a TNC's platform, any vehicle must undergo a subsequent 19-point vehicle inspection by a BAR-licensed facility every 12 months or upon accruing 40,000 in-app miles, whichever occurs first. The specific modifications are contained in Attachment A.

Respectfully submitted,

By: /s/____________________________

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Attorneys for Uber Technologies, Inc.

Dated: July 10, 2026

ATTACHMENT A

Proposed Modification to G.O. 157-E, § 4.05 (as adopted in TL-19129)

§ 4.05. All charter-party carriers, not including TNCs, shall ensure that every vehicle, except vehicles defined as a bus pursuant to California Vehicle Code § 233, and modified limousines as defined in Pub. Util. Code § 5361, utilized in its operations undergoes a 19-point vehicle inspection at a facility licensed by the California Bureau of Automotive Repair ("BAR") prior to initial operation and every 12 months or 50,000 miles thereafter.

All TNCs shall ensure that any vehicle that operates on its platform undergoes a 19-point vehicle inspection by a BAR-licensed facility prior to initial operation on its platform. Thereafter, all TNCs must ensure that all vehicles that travel 40,000 miles while engaged on the TNC's platform or every 12 months, whichever comes first, undergoes 19-point vehicle inspections by a BAR-licensed facility.

The 19-point inspection shall include the items on the following checklist:

1. Foot brakes
2. Emergency brakes
3. Steering mechanism
4. Windshield
5. Rear window and other glass
6. Windshield wipers
7. Headlights
8. Tail lights
9. Turn indicator lights
10. Stop lights
11. Front seat adjustment mechanism
12. Doors (open, close, lock)
13. Horn
14. Speedometer
15. Bumpers
16. Muffler and exhaust system
17. Condition of tires, including tread depth
18. Interior and exterior rear view mirrors
19. Safety belts for driver and passenger(s)

Proposed Modification to D.16-04-041, Ordering Paragraphs 1 and 2

1. All Charter Party Carrier (TCP) vehicles, not including vehicles operating on Transportation Network Companies (TNC) platforms, shall be inspected by a facility licensed by the California Bureau of Automotive Repair (BAR) (a) before the vehicle is first introduced into service as a TCP ~~or TNC~~ vehicle; and (b) every 12 months or 50,000 miles thereafter, whichever occurs first. All TNCs shall ensure that vehicles operating on their platform are inspected by a BAR-licensed dealer prior to initial operation on their platform. Thereafter, all TNCs must ensure that vehicles that travel 40,000 miles while engaged on the TNC's platform or every 12 months, whichever comes first, are inspected by a BAR-licensed facility. TCPs and TNCs shall be responsible for ensuring that ~~each of~~ their vehicles/drivers' vehicles comply~~ies~~ with this requirement, and shall maintain records of such compliance for a period of three years. This requirement shall apply to drivers who are presently driving for TNCs, and who will become TNC drivers after this decision is issued. Safety and Enforcement Division shall collect data from each TNC on the number of ~~TNC~~ vehicles that have traveled more than ~~50,000~~ 40,000 miles while operating on the TNC's platform within a year and shall report its findings to the Commission as part of its annual report.

2. Pursuant to Pub. Util. Code § 5389, Charter Party Carriers (TCPs), including Transportation Network Companies (TNC) shall maintain records for a period of three years demonstrating that all TCP vehicles and TNC ~~vehicles/~~drivers' vehicles were inspected by a facility, licensed by the California Bureau of Automotive Repair, at the appropriate 12-month or ~~50,000~~-applicable mile mark as described in Ordering Paragraph 1, and shall make such records available for inspection by the Commission.

ATTACHMENT B

DECLARATION OF ASHLEY FILLMORE

Pursuant to Rule 16.4(b) of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, I, Ashley Fillmore, declare and state as follows:

1. I am a Senior Regulatory Counsel at Uber Technologies, Inc. ("Uber"), Joint Petitioner in this matter with Lyft, Inc. ("Lyft"). I have personal knowledge of the facts stated in this declaration and could and would competently testify thereto.
2. In this role, I oversee and/or advise regarding regulatory compliance matters relating to Uber's transportation network company ("TNC") operations, including in California.
3. Uber's platform relies on drivers who use their personal vehicles on a flexible basis rather than on a fleet of commercially dedicated vehicles owned or operated by Uber.
4. Because drivers use their personal vehicles both on and off the Uber platform, Uber cannot precisely determine when a vehicle reaches a particular total mileage threshold based on all miles traveled.
5. Uber has made substantial efforts to comply with the current vehicle inspection requirements applicable to TNCs.
6. Although the technical challenges associated with the current vehicle inspection requirements are not new, only recently has the Commission's Transportation Enforcement Branch ("TEB") made clear through its enforcement approach that Uber's substantial compliance efforts from approximately 2019 through 2022 are not sufficient to satisfy the current framework.
7. While industry practices have remained consistent for many years, TEB's recent transition toward a strict-compliance enforcement model with respect to vehicle inspection requirements represents a significant change in the regulatory and enforcement landscape applicable to TNCs.
8. This move away from long-standing administrative norms constitutes a material change in circumstances, necessitating this Petition to ensure the Commission's requirements align with current oversight realities.
9. Uber's discussions with TEB, including discussions that led to Resolution TEB-001, have made clear that modification of the current vehicle inspection framework is necessary to

align the Commission's requirements with the operational realities of the TNC model and current enforcement expectations.

10. Recent enforcement developments relating to those requirements have increased the operational challenges associated with compliance under the current framework.
11. Modifying the current inspection framework to use an in-app mileage threshold could better align the requirements with the operational realities of the TNC model while continuing to support vehicle safety oversight and Commission oversight of compliance.

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

Executed on July 10, 2026, at San Francisco, California.

/s/

Ashley Fillmore, Senior Regulatory Counsel
Uber Technologies, Inc.

ATTACHMENT C

DECLARATION OF JANÉE WEAVER

Pursuant to Rule 16.4(b) of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure, I, Janée Weaver, declare and state as follows:

1. I am a Senior Counsel at Lyft, Inc. ("Lyft"), Joint Petitioner in this matter with Uber Technologies, Inc. ("Uber"). I have personal knowledge of the facts stated in this declaration and could and would competently testify thereto.
2. In this role, I oversee and/or advise regarding regulatory compliance matters relating to Lyft's transportation network company ("TNC") operations, including in California.
3. Lyft's platform relies on drivers who use their personal vehicles on a flexible basis rather than on a fleet of commercially dedicated vehicles owned or operated by Lyft.
4. Because drivers use their personal vehicles both on and off the Lyft platform, Lyft cannot precisely determine when a vehicle reaches a particular total mileage threshold based on all miles traveled.
5. Lyft has made substantial efforts to comply with the current vehicle inspection requirements applicable to TNCs.
6. Although the technical challenges associated with the current vehicle inspection requirements are not new, only recently has the Commission's Transportation Enforcement Branch ("TEB") made clear through its enforcement approach that Lyft's substantial compliance efforts from approximately 2019 through 2022 are not sufficient to satisfy the current framework.
7. While industry practices have remained consistent for a decade, TEB's recent transition toward a strict-compliance enforcement model with respect to vehicle inspection requirements represents a fundamental shift.
8. This move away from long-standing administrative norms constitutes a material change in circumstances, necessitating this Petition to ensure the Commission's requirements align with current oversight realities.
9. Lyft's ongoing discussions with TEB staff have made clear that modification of the current vehicle inspection framework is necessary to align the Commission's

requirements with current oversight realities and the operational realities of the TNC model.

10. Recent enforcement developments relating to those requirements have increased the operational challenges associated with compliance under the current framework.
11. Modifying the current inspection framework to use an in-app mileage threshold could better align the requirements with the operational realities of the TNC model while continuing to support vehicle safety oversight and Commission oversight of compliance.

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

Executed on July 9, 2026, at San Francisco, California.

Signed by:

Janeé Weaver

D71EA13C62F54A4...

Janée Weaver, Senior Counsel
Registered In House Counsel In California
Lyft, Inc.