

CALIFORNIA PUBLIC UTILITIES COMMISSION
Consumer Protection and Enforcement Division
Advice Letter Summary Form

TNC & AL FILER INFORMATION

Date of Submission: 4/5/2024	Date of Service: 4/5/2024
TNC Name: Lyft, Inc.	PSG #: 0032513
DBA Name: Lyft	
Address: 185 Berry St., Suite 400	
City: San Francisco	State: CA ZIP Code: 94107
Filer's Name: Janee Weaver	
Filer's Email: jweaver@lyft.com	Filer's Phone: 415-475-8459

AL INFORMATION

Advice Letter #: WAV-020A	AL Type: <input checked="" type="checkbox"/> Offset <input type="checkbox"/> Exemption
Geographic Area(s): Los Angeles and San Francisco Counties	
Offset Amount: \$1,219,953.79	Quarter: Q4 Year: 2024
Documents Included: <input checked="" type="checkbox"/> Cover letter <input checked="" type="checkbox"/> Service List <input type="checkbox"/> Training Declaration <input type="checkbox"/> Marketing Materials <input type="checkbox"/> Signed Accounting of Funds <input type="checkbox"/> Inspection Declaration <input type="checkbox"/> Data Reports (CSV)	
Reason (if not all document boxes above are marked): Submission of corrected Cover Letter and Summary Form	

SUBMISSION INFORMATION

Combine (in this order) AL summary form, cover letter, service list, marketing materials, TNC WAV training declaration, TNC vehicle inspection declaration, and signed Accounting of Funds Expended, into a single PDF file. The completed data reports must be in separate CSV files. A complete advice letter submission will consist of the following attachments: the PDF and CSV files. Submit the advice letter via email with the attachments to TNCAccess@cpuc.ca.gov and to the [R.19-02-012 service list](#).

The cut off time to be considered filed the same day as submitted is 5:00 PM (Pacific Standard Time). Files submitted after 5:00 PM or on a non-business day will be considered filed on the following business day.

FOR CPUC USE ONLY

Analyst:	30-Day Due Date:
Completion Date:	Disposition:
Approved Offset/Retroactive Amount:	AL Effective Date:
Supervisor:	Supervisor Review Date:



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 Suite 400
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April 5, 2024
 Lyft, Inc.
 Advice Letter No. WAV-020A

California Public Utilities Commission
 Consumer Protection and Protection Division
 Transportation Licensing and Analysis Branch
 505 Van Ness Avenue
 San Francisco, CA 94102

Pursuant to Decision (D.) 20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, Lyft, Inc. submits this supplement (amended) Advice Letter No. WAV-020A to request an offset, against the quarterly Access Fund payments due, the amounts spent by Lyft, Inc. to improve wheelchair accessible vehicle (WAV) service in Quarter 4 of 2023. The requested effective date is February 15, 2024 (30 days from date of the original submission) and remains unchanged.

The offset amounts requested by county are as follows:

County	Offset Expenses (\$)	Percent Allowed (%)¹	Offset Requested (\$)
LOS ANGELES	\$947,975.22	99.71%	\$945,267.49
Subtotal:			\$945,267.49
SAN FRANCISCO			
	\$279,815.30	98.17%	\$274,686.30
Subtotal:			\$274,686.30
Total Offset Request	\$1,227,790.52		\$1,219,953.79

¹ D.23-02-024 OP6.



Per D.20-03-007, D.21-03-005, D.21-11-004, and D.23-02-024, Lyft, Inc. provides the following documents in support of its request (including all counties for which the TNC seeks offsets):

1. Cover Letter
2. Advice Letter Summary Form

These documents above reflect the following changes that were not included in Lyft’s original submission:

- The “Total Offset Amount” appearing in the Cover Letter and Advice Letter Summary Form has been corrected. An inaccuracy in the Total Offset Amount that appeared in the original Offset Request was the result of a rounding error.

Criteria	Must Demonstrate	Documentation Included (Y/N)
1. Presence and availability of on-demand and pre-scheduled WAVs²	(a) the number of WAVs in operation - by quarter and aggregated by hour of the day and day of the week; and (b) the unique number of WAVs in operation – by quarter and by hour of the day and day of the week; and (c) the number and percentage of WAV trips completed, not accepted, cancelled by passenger, cancelled due to passenger no-show, and cancelled by driver – by quarter and aggregated by hour of the day and day of the week; (d) the total WAV trips requested and completed broken out by Census Tract; and (e) operating hours for each geographic area	Y

² D.20-03-007 Ordering Paragraph 1; D.23-02-024 Ordering Paragraph 11 and 12



Criteria	Must Demonstrate	Documentation Included (Y/N)
2a. Improved level of service (on-demand WAVs)³	Both the Offset Time and the Trip Completion Standards are satisfied: (a)(1) Offset Time Standard & WAV Response Times ⁴ : Meet or exceed both the relevant Level 1 and Level 2 Response Time Benchmarks for a given quarter in a given geographic area within the Offset Response Time Benchmarks (ORTB). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request in that quarter (see Table A) (b.1) Trip Completion Standard ⁵ : Meet or exceed the applicable minimum percentage of trip requests completed (see Table B), and (b.2) Either (i) a greater number of completed trips than in the immediately prior quarter, or (ii) a greater number of completed trips than in the immediately prior year's same quarter, if sufficient data is available. A TNC may elect to be compared to this prior quarter or prior year's same quarter, if applicable (see Table C). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.	Y

³ D.21-11-004 Ordering Paragraph 1-3, 6, and 7

⁴ D.21-11-004 Ordering Paragraph 1, 2, and 3

⁵ D.21-11-004 Ordering Paragraph 6 and 7



Criteria	Must Demonstrate	Documentation Included (Y/N)
2b. Improved level of service (pre-scheduled WAVs)⁶	Both the Pickup Delay Benchmark and the Trip Completion Standards are satisfied: (a) Pickup Delay Standard within the Pickup Delay Benchmark ⁷ : Meet or exceed both the relevant Response Time Benchmarks for a given quarter in a given geographic area within the Pre-scheduled Pickup Delay Benchmarks (PDB). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request in that quarter (see Table D) (b.1) Pre-scheduled Trip Completion Standard ⁸ : Meet or exceed the applicable minimum percentage of trip requests completed (see Table E), and (b.2) Either (i) a greater number of completed trips than in the immediately prior quarter, or (ii) a greater number of completed trips than in the immediately prior year's same quarter, if sufficient data is available. A TNC may elect to be compared to this prior quarter or prior year's same quarter, if applicable (see Table F). The schedule shall advance each quarter, regardless of whether a TNC submits an Offset Request.	N

⁶ D.23-02-024 Ordering Paragraph 1-5

⁷ D.23-02-024 Ordering Paragraph 4

⁸ D.23-02-024 Ordering Paragraph 5



<p>3. Efforts to publicize and promote available WAV services⁹</p>	<p>Evidence of outreach efforts such as a list of partners from disability communities, how the partnership promoted WAV services, and marketing or promotional materials of those activities including but not limited to:</p> <ul style="list-style-type: none"> (a) Submitted an annual outreach plan (due no later than July 1 of each year), (b) Information about disability access and WAV in general marketing campaigns, (c) Submit a quarterly report for each offset county on the following: Progress made towards implementing the outreach plan; The number of entities contacted; The method, nature, outcome of the contact; the number of partnerships developed; Efforts to publicize and promote WAV service in each offset Los Angelesnd whether efforts were accessible to people with disabilities and limited English proficiency; Educational materials developed and distributed; and outcome of TNCs efforts to outreach and engage wheelchair users. <p>Quarterly Report shall also address the following questions:</p> <ol style="list-style-type: none"> 1. What methods of engagement did the TNC find most effective and why? <p>Community Outreach: The most effective engagement for Q4 2023, in San Francisco and Los Angeles counties, was when Lyft reconnected with six organizations Lyft held WAV introductory meetings with in Q3 2023. From those six organizations, two agreed to do a campaign with Lyft around International Disabilities Day in December. Through this campaign Lyft was able to bring awareness and educate people on Lyft’s WAV service.</p> <p>Marketing: During Q4 2023 Lyft leveraged Google paid searches. A paid search involved showing a user an ad based on their explicit search query. This tactic helped ensure Lyft showed ads to the most relevant audience.</p>	<p>Y</p>
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⁹ D.20-03-007 Ordering Paragraph 9, and D.23-02-024 Ordering Paragraph 16



	<p>Earned Media: In honor of International Day of Persons with Disabilities we launched a ride code partnership with two organizations in Los Angeles and San Francisco counties to support individuals with disabilities that traveled during the holiday season. This effort generated earned media coverage highlighting Lyft’s WAV service and the organizations we partnered with on this effort.</p> <p>2. What common concerns/questions came up during the engagement process?</p> <p>The following two questions were raised to Lyft during the engagement process:</p> <ul style="list-style-type: none">• What is the average wait time for a Lyft WAV to arrive?• Will WAV be accessible to all of California and other states? <p>3. What challenges have you encountered? How do you plan to overcome them?</p> <p>Community Outreach: In Q4 2023, Lyft encountered challenges when engaging four organizations: The four organizations were; Disabilities Rights California, SF Mayor’s Office of Disability, California Commission on Disability Access, and City of Los Angeles Office of Disability. These organizations were hesitant to work with Lyft on the earned media campaign discussed above in our response to question 1. The hesitation was the result of not having proper knowledge of Lyft’s WAV program and obtaining a response via email or phone to set up a meeting with Lyft that would include an explanation of WAV. However, with the earned media coverage we garnered and ride credits we granted to the organizations who agreed to partner with Lyft, we are confident that we will not encounter the same challenges in the future.</p>	
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Criteria	Must Demonstrate	Documentation Included (Y/N)
	<p>Marketing: Generally a WAV advertising user conversion, people who clicked an ad and then became a lyft rider, were weak when compared to generalized ad performance. It appears Right a lot of people click our ad and visit the landing page but do not become users. Lyft predicts by including more variety of information on the landing page may improve results.</p>	
<p>4. Full accounting of funds expended¹⁰</p>	<p>Qualifying offset expenses are: (a) reasonable, legitimate costs that improve a TNC's WAV service, and (b) incurred in the quarter for which a TNC requests an offset, and (c) on the list of eligible expenses attached as Appendix A, and (d) net of fare revenues collected from WAV service delivery in the quarter for which a TNC requests an offset¹¹</p>	<p>Y</p>
<p>5. Training and inspections¹²</p>	<p>(a) certification of WAV driver training completion within the past 3 years, and (b) WAV driver training programs used per geographic area, and the number of WAV drivers that completed WAV training in that quarter, and (c) Certification of WAV inspection and approval</p>	<p>Y</p>
<p>6. Reporting complaints¹³</p>	<p>Number of complaints related to WAV drivers or services – by quarter and geographic area, and broken out by category: Securement Issues; Driver Training; Vehicle Safety and Comfort; Service Animal; Stranded Passenger, Pickup, Drop Off, and Other issues.</p>	<p>Y</p>

¹⁰ D.20-03-007 Ordering Paragraph 10

¹¹ D.21-11-004 Ordering Paragraph 9

¹² D.20-03-007 Ordering Paragraph 13 and 15(f), 15(g), and 15(h)

¹³ D.20-03-007 Ordering Paragraph 14



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Table A: Level 1 and Level 2 Offset Time Standards (percent) and ORTB (minutes) by County

County	Q3 2023					TNC claims the data demonstrates meeting or exceeding % of completed trips and within ORTB for Level 1 and 2?
	# Quarter Submission (1 st , 2 nd , 3 rd , ...8 th)	Level 1 (%)	Level 1 (mins)	Level 2 (%)	Level 2 (mins)	
Los Angeles	7	74.42%	20.9	97.89%	29.45	Yes
San Francisco	7	85.13%	10.74	99.39%	15.11	Yes

Table B: Trip Completion Standard (part b.1)

County	# Quarter Submission (1 st , 2 nd , 3 rd , ...8 th)	County Group A, Group B, or Group C?	Trip Completion Rate (%)	TNC claims the data demonstrates meeting the minimum % of trip requests completed?
Los Angeles	7	B	74.55%	Yes
San Francisco	7	A	86.44%	Yes

Table C: Trip Completion Standard (part b.2)

County	Option 1 or 2 ¹⁴	(1) # of completed trips previous quarter	(2) # of completed trips in the immediately prior year's same quarter	(1) # of completed trips this quarter	(2) # of completed trip this quarter
Los Angeles	2	6,020	5463	7,002	7,002
San Francisco	2	510	370	491	491

Table D: Pre-scheduled Pickup Delay Standards (PDS) (percent) and Pickup Delay Benchmarks (PDB) (minutes) by County

County	Q3 2023			TNC claims the data demonstrates meeting or exceeding % of completed trips and within PDB?
	# Quarter Submission (1 st , 2 nd , 3 rd , ...8 th)	PDS (%)	PDB (mins)	
Los Angeles	2	75.00%	15.47	No
San Francisco	2	100.00%	6.03	Yes

¹⁴ See D.21-11-004 Ordering Paragraph 6.



Table E: Pre-scheduled Trip Completion Standard (part b.1)

County	# Quarter Submission (1 st , 2 nd , 3 rd , ...8 th)	County Group A, Group B, or Group C?	Pre-scheduled Trip Completion Standard (%)	TNC claims the data demonstrates meeting the minimum % of trip requests completed?
Los Angeles	2	B	62.50%	No
San Francisco	2	A	75.00%	No

Table F: Pre-scheduled Trip Completion Standard (part b.2)

County	Option 1 or 2 ¹⁵	(1) # of completed trips previous quarter	(2) # of completed trips in the immediately prior year's same quarter	(1) # of completed trips this quarter	(2) # of completed trip this quarter
Los Angeles	2	31	0	20	20
San Francisco	2	1	0	9	9

Per D.23-02-24¹⁶, Lyft, Inc. submits information on the on-demand and Pre-scheduled Service Mix as indicated in the table below.

Table G: On-demand and Pre-scheduled Service Mix

County	# of On-Demand WAV Trips	# of Pre-scheduled WAV Trips	% of On-Demand WAV trips out of the total Pre-scheduled WAV trips	% of Pre-scheduled WAV trips out of the total on-demand WAV trips
Los Angeles	7,002	20	35010.00%	0.29%
San Francisco	491	9	5455.56%	1.83%

¹⁵ See D.23-02-024 Ordering Paragraph 5.

¹⁶ See D.23-02-024 Ordering Paragraph 6.



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Per D.23-02-24¹⁷, Lyft, Inc. submits information on the Wait and Save Data as indicated in the table below.

Table H: Wait and Save

County	# of WAV Wait & Save Trips	# of On-Demand WAV Trips	% of Wait & Save Trips out of the total on-demand WAV trips
Los Angeles	2294	7,002	32.76%
San Francisco	266	491	54.18%

In compliance with General Order 96-B, Lyft has served a copy of this supplement (amended) advice letter via email upon the parties identified on the attached R.19-02-012 service list on April 5, 2024. If there are any questions regarding this advice letter, please contact Janeé Weaver at jweaver@lyft.com.

Any Party can protest or respond to this advice letter by sending a written protest or response via email to CPED at TNCAccess@cpuc.ca.gov. If submitting a protest, the protest must set forth the specific grounds on which it is based, including supporting information or legal arguments. A protest or response to the advice letter must be submitted to CPED within twenty (20) days of the date the advice letter was filed and must be served on the TNC on the same day.

Email a copy of the protest or response to this advice letter to Janeé Weaver at jweaver@lyft.com.

To obtain information about the CPUC’s procedures for advice letters and protests, visit CPUC’s website at www.cpuc.ca.gov and look for links to General Order 96-B.

I HEREBY CERTIFY UNDER THE PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOLLOWING ATTACHMENTS HAVE BEEN EXAMINED BY ME AND IS TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Yours truly,

Janeé Weaver
 Senior Counsel, Regulatory Compliance
 Lyft, Inc.
 Registered In House Counsel - California Bar

¹⁷ See D.23-02-024 Ordering Paragraph 11.



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R1902012 - CPUC - OIR TO IMPLEM
FILER: CALIFORNIA PUBLIC UTILITIES COMMISSION
LIST NAME: LIST
LAST CHANGED: MARCH 21, 2024

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