



California Public
Utilities Commission

Monthly Activity Report

CONSUMER PROTECTION AND
ENFORCEMENT DIVISION

September 2024

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TRANSPORTATION LICENSING AND ANALYSIS BRANCH (TLAB)

TLAB’s Licensing Section analyzes applications from carriers, issues permits and certificates to carriers that meet state requirements, writes proposed decisions to approve or deny carriers’ CPCN applications, manages changes to carrier operations, communicates with carriers, and tracks carrier compliance with permit requirements. TLAB’s Analysis Section functions as the Commission’s subject matter expert on policy matters, providing technical and advisory support to commissioners, administrative law judges, and all levels of agency management on transportation matters.

Processing Carrier Applications

TLAB’s Transportation Licensing Section is processing and managing applications for over 7,600 carriers throughout California. Items processed in September 2024 include applications, vehicle and driver updates, vehicle safety inspection results, and other requests. This work is accomplished through the CPUC Transportation Carrier Portal (TCPortal), an online system that allows carriers to submit applications and other requests electronically and make payments online. The TCPortal tracks certain licensing activities as shown in the following tables and figures.

Figure 1. Total Permits & Certificates

Total Permits and Certificates. Figure 1 shows the total number of operating authorities (active and suspended) by month.

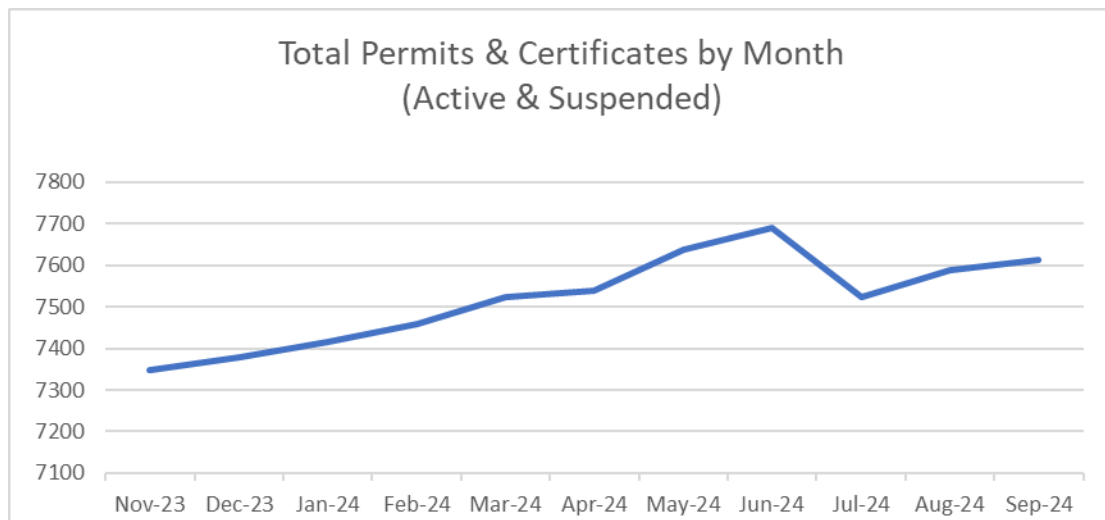


Table 1. Permits and Certificates by Category

Permits and Certificates by Category. The Commission grants permits and certificates for five categories of transportation carriers. Table 1 shows total numbers for those categories in the current month.

Carrier Type	Current Total
Transportation Charter Party	7,477
Passenger Stage Corporation	100
Vessel Common Carrier	15
Transportation Network Company	16
Autonomous Vehicle	5

Figure 2. Monthly Completions of Permit Categories

Monthly Completions of Permit Categories. In addition to new applications for operating authorities, TLAB processes refile applications, transfer applications, and renewal applications. Figure 2 shows the application numbers of each category completed by month.

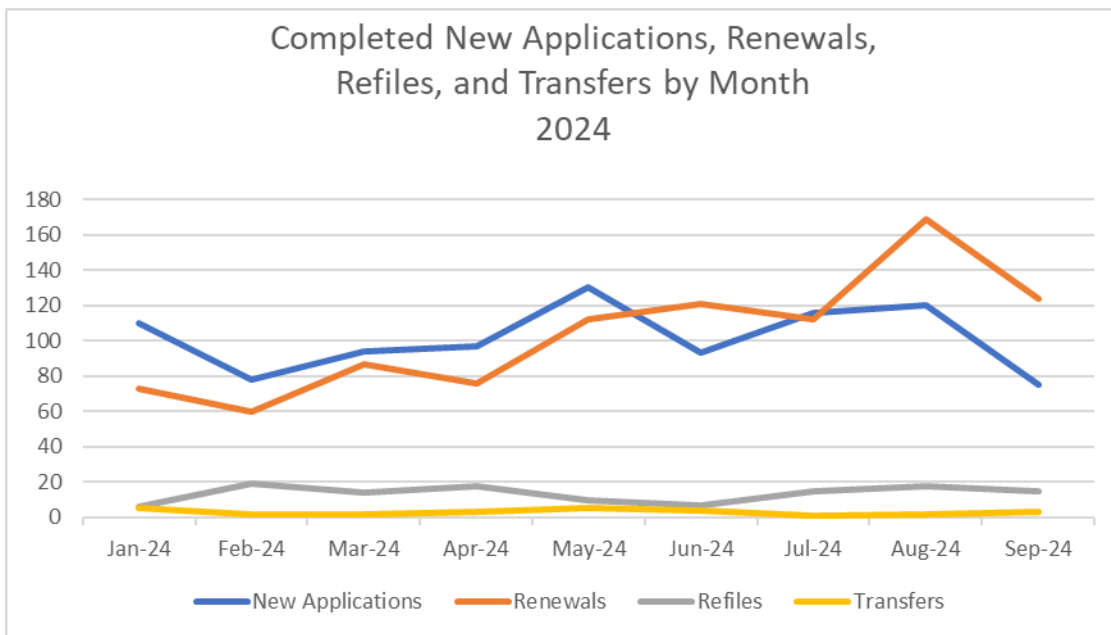


Figure 3. Suspensions and Revocations by Month

Suspensions and Revocations. Carriers can be suspended or revoked for various reasons such as failing to maintain active insurance or to file annual or quarterly PUCTRA statements. Carriers may also voluntarily suspend operations. Figure 3 shows both types of suspensions and revocations by month.

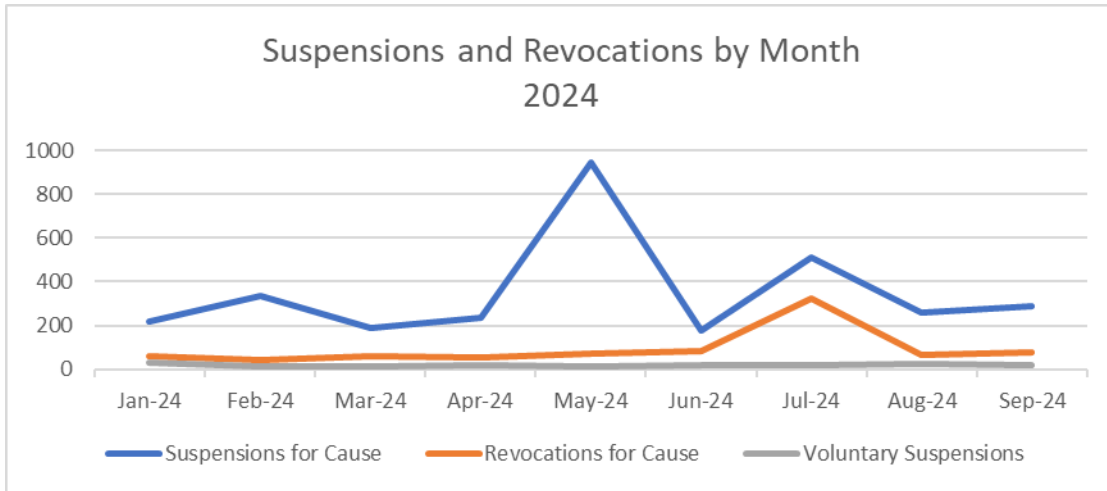
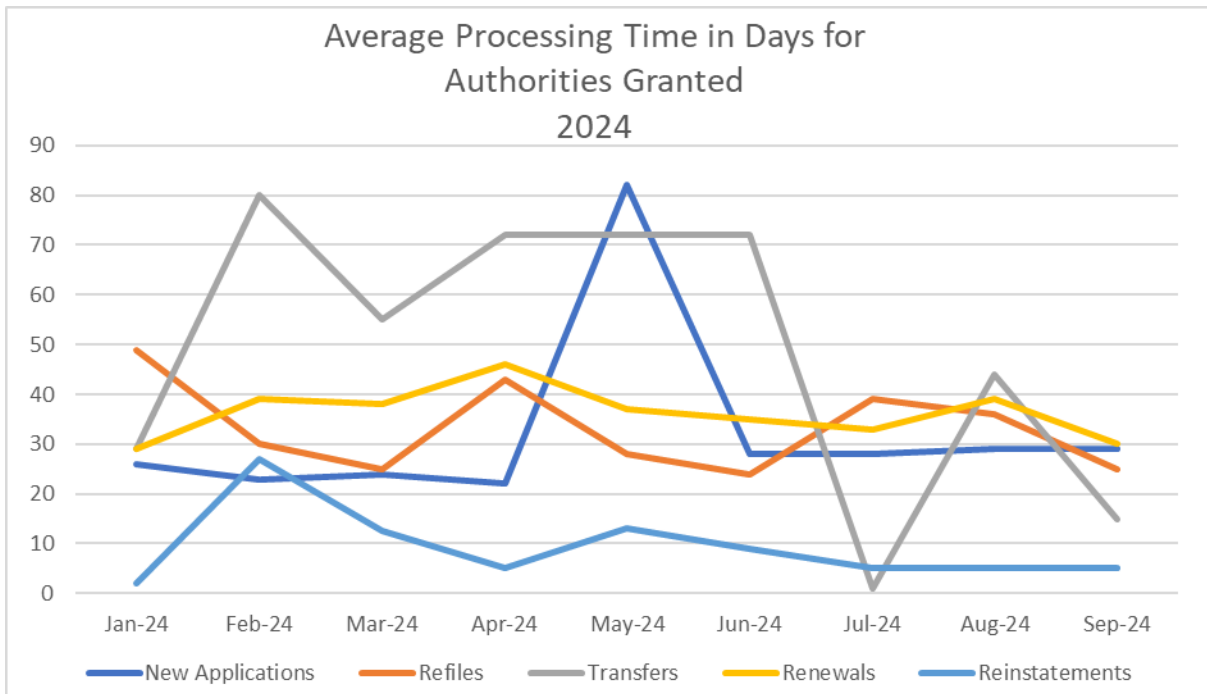


Figure 4. Average Processing Times

Average Processing Times. The total time to process an application, from initial receipt to issuance or denial of a permit or certificate, depends on internal processing time and on the time for external entities to provide necessary information. Upon receipt of applications, CPUC staff review them for completeness and issue deficiency notices to carriers for any outstanding items.

Examples of these items include evidence of insurance coverage filed by the carrier’s insurance provider; evidence of compliance with drug and alcohol testing requirements; and inspection by the California Highway Patrol for modified limousines and vehicles with a seating capacity of 11 or more. Figure 4 shows the average total processing time for the major categories of permits and certificates processed by TLAB.



Docket Activity

Current Policy and Program Proceedings. The Transportation Analysis Section supports three current proceedings. R.12-12-011 develops regulations relating to transportation network companies and autonomous vehicles. R.19-02-012 implements Senate Bill 1376, incentivizing transportation network companies to provide on-demand service for persons with disabilities, including wheelchair users who need a wheelchair accessible vehicle. R.21-11-004 implements the California Clean Miles Standard and Incentive Program, enacted through Senate Bill 1014, requiring the California Air Resources Board and the Commission to jointly work to lower greenhouse gas emissions from transportation network companies.

- 1) **R.12-12-011 / TNC Rulemaking / Mason & Chiv / Baker**
 - Docket activity can be found [here](#)
- 2) **R.19-02-012 / TNC Access Rulemaking / Chiv / Baker**
 - Docket activity can be found [here](#)
- 3) **R.21-11-014 / Clean Miles Standard / Mason, Goldberg / Reynolds**
 - Docket activity can be found [here](#)

Carrier Application Proceedings. The Transportation Licensing Section assists the Commission in the regulation of Passenger Stage Corporations and Vessel Common Carriers. Passenger Stage Corporations

(PSCs) are carriers that transport passengers between points on an individual fare basis. Examples are fixed-route bus services and “share-the-ride” airport shuttle services. Vessel Common Carriers (VCCs) are carriers that transport persons or property between points in the State. Examples are commute ferry services in the San Francisco Bay and services between California mainland points and Catalina Island. PSCs and VCCs are common carriers and must file requests with the Commission through a formal process. Both carrier types require a “certificate of public convenience and necessity” (CPCN) from the Commission for the authority to operate in California.

- **A.24-05-021** / Application of INTREPIDOS LLC for authority to operate as an on-call Passenger Stage Corporation between points in SAN FRANCISCO and SAN FRANCISCO INTERNATIONAL AIRPORT and to establish a Zone of Rate Freedom. / **09/27/2024 The Commission adopted Decision 24-09-027 granting Application.**

Joint Agency Collaboration/Outreach/Training

Joint Agency Collaboration. Information sharing and collaboration with other transportation agencies is a critical part of TLAB’s work.

- Bi-monthly TLAB Staff and CARB Staff coordination meeting on the Clean Miles Standard
- Bi-monthly Staff Work Group meeting between TLAB and Department of Motor Vehicles Autonomous Vehicles Branch

Outreach and Education. TLAB provides outreach and education to potential and current carriers through presentations on application fundamentals at venues such as SFO and LAX, and attendance at functions sponsored by transportation-related organizations such as the Greater California Livery Association and the California Bus Association.

Training. TLAB managers and staff regularly attend all trainings required by the Commission, as well as trainings for developing work skills and industry-specific trainings. For example:

- New Employee Training
- Supervisory Development Training
- Cybersecurity Training
- Harassment Prevention and Diversity and Bias Awareness Training
- Leadership Training

TRANSPORTATION ENFORCEMENT BRANCH (TEB)

The Transportation Enforcement Branch (TEB) regulates Charter-Party Carriers of Passengers (TCP) (e.g., limousines, airport shuttles, autonomous vehicles while in passenger service, chartered and scheduled bus operators, Transportation Network Companies (TNC) and vessels in California to safeguard the public by ensuring compliance with Commission General Orders (GO), Public Utilities (PU) Codes, and other applicable laws and regulations. TEB conducts our core safety assurance through compliance inspections, investigations, and enforcement activities. TEB also promotes safety by conducting outreach activities for passenger carriers, training for law enforcement on applicable General Order regulations, and reviews all public complaints that it receives.

Consistent with the Commission’s Strategic Directives¹ and Enforcement Policy,² TEB developed and utilizes a Safety Management System that is implemented through the following pillars: Transportation Safety Assurance, Transportation Risk Management, and Transportation Safety Promotion.

Transportation Safety Management System

TEB reports the following progress for September 2024 for the following program elements.

Transportation Safety Assurance – Assuring the Commission’s regulated entities comply with the law and have sufficient training and resources to ensure the safety of the public, their workers, and the environment. For TEB, this includes Investigations, Field Operations, and related Enforcement Activities.

- Transportation Enforcement Field and Airport Operations:
 - » Cross Border Express Terminal (CBX)
 - » San Jose International Airport (SJC)
 - » Napa
 - » Los Angeles Union Station
 - » Los Angeles International Airport (LAX)
 - » Levi’s Stadium

¹ [CPUCs Strategic Directives \(ca.gov\)](#)

² [CPUC Adopts Enforcement Policy to Promote Maximum Compliance, Transparency, and Public Safety](#)

- Formal Enforcement Proceedings:
I.21-12-001/Uber Technologies, Inc. (Uber), and Uber Black Sub-carriers/ALJ Lirag/Commissioner Baker. On August 20, 2024, the Presiding Officer, ALJ Lirag, issued a Proposed Decision.
 - » On September 19, 2024, CPED filed an appeal of the Presiding Officers Decision.
- Transportation Safety Complaint Referrals:
 - » For the month of September 2024, TEB received a total of 53 complaints from CAB and other sources:

Table 2. Transportation Safety Complaint Referrals

Complaints Referred By:	Received
Los Angeles Airport Police Department (LAXPD)	25
San Francisco Ground Transportation Unit (SFO GTU)	14
Safety Enforcement Division (SED) Whistleblower	6
CAB	4
Fiscal Audits	2
Transportation Licensing and Analysis Branch (TLAB)	1
Utilities Enforcement Branch (UEB)	1

Transportation Risk Management – Continually identifying, assessing, and reducing operational risks through mitigation measures faced or posed by the transportation carriers the CPUC regulates. Continued monitoring of information, including but not limited to data obtained from field enforcement operations for emerging trends and any associated risks above the risk tolerance level.

Transportation Safety Promotion – Supporting efforts to assure that the public and regulated transportation entities can make informed choices and know how to respond to unsafe situations. For TEB, this includes Training and Education, Outreach Efforts with Industry and Law Enforcement, and Commission Engagement.

- San Jose International Airport Training on September 18, 2024

Table 3. TEB Enforcement Activities³

12 Month Enforcement Activity	Jan 2024	Feb 2024	Mar 2024	April 2024	May 2024	June 2024	July 2024	Aug 2024	Sept 2024	Oct 2024	Nov 2024	Dec 2024	Total
Beginning Investigations Balance	98	91	128	133	125	122	137	156	112				N/A
(+) New Investigations	15	41	17	16	18	26	40	13	22				208
(-) Closed Investigations	22	4	12	24	21	11	19	57	21				170
Ending Investigations Balance	91	128	133	125	122	137	156	112	113				N/A
Investigations Open Longer than 6 Months	11	14	13	8	21	19	34	10	8				N/A
% Of investigations Open Longer than 6 Months	12%	11%	10%	6%	17%	14%	22%	9%	7%				N/A
Cease and Desist Notices	5	12	13	19	18	28	29	17	25				166
Warning Letters	3	8	6	10	13	12	8	1	25				86
Citations	9	2	6	4	9	3	4	6	7				50
Vehicle Impounds	5	0	0	1	1	1	0	7	3				18

³ Effective January 2024, TEB will submit data based on the calendar year.

Table 4. TEB Fines Assessed from Investigations

Date	Citations/Fines
January 2024 – August 2024	\$305,000
September 2024	\$50,000
Cumulative 2024	\$355,000

Table 5. Citation Appeal Proceedings

Docket No.	Entity	Status
K.22-11-012	Edwin Torres, North Hollywood, unlicensed (PSG-5685)	Citation T.22-10-001 served October 24, 2022. Appeal Filed November 10, 2022. On February 7, 2023, CPED attended an ADR/Mediation, but CPED subsequently decided to withdraw from any further mediation sessions. On February 21, 2024, a new ALJ, Andrew Dugowson was assigned. On May 13, 2024, ALJ Dugowson set a remote status conference for July 15, 2024. On September 3, 2024, ALJ Dugowson issued a ruling ordering a Joint Case Management Statement (Due: 10/11/24)
K.23-04-007	Lkhavasuren Dulmaa, Moraga, unlicensed. (PSG 5804)	CPED filed a joint motion for withdrawal of the appeal on August 19, 2024
K.23-12-016	Thorne Transportation Services (PSG-5955)	Citation T.23-11-001 served November 1, 2023. Filed December 22, 2023. PHC was on April 26, 2024, at 1:00 p.m. Pending ruling from ALJ
K.24-04-007	Bauer’s Hotel Shuttle LLC, San Francisco. Active (TCP 28103)	Citation T.24-03-001 Served March 26, 2024. Filed April 15, 2024. ALJ Patrick Petersen was assigned on April 23, 2024. Prehearing conference set for August 22, 2024, at 10:00 a.m. was cancelled. On September 24, 2024, ALJ ruled granting consumer protection and enforcement division’s motion to file under seal
K.24-06-003	Alva Limolux LLC, San Francisco (TCP 39397)	Citation T.24-05-008 served May 24, 2024. Filed June 10, 2024. PHC has not yet been scheduled. ALJ: Kieuchinh Tran (Assigned June 19, 2024) Commissioner: (Assigned June 19, 2024). PHC scheduled for August 29, 2024, at

Docket No.	Entity	Status
		1:00 p.m.
K.24-05-024	Tutor Time Learning Center, LLC (TCP 41692)	Citation T. 24-04-004 for \$15,000 served on April 29, 2024. Filed May 30, 2024. ALJ: Gerald F. Kelly (Assigned June 4, 2024) Commissioner: (Assigned June 4, 2024). Email Ruling Setting in Person Evidentiary Hearings and Requiring Certain Actions of the Parties Evidentiary hearings will be conducted in person in this matter at the Commission’s San Francisco Hearing Room located at 505 Van Ness Avenue, San Francisco, California 94102. Hearings will be conducted as follows: November 5, 2024. 10:30 a.m. to 3:30 p.m. November 6, 2024, 10:30 a.m. to 3:30 p.m.
K.24-05-027	Tutor Time Learning Center, LLC (TCP 41692)	Citation T.22-11-003 for \$16,000 served on November 22, 2022. Filed May 30, 2024. ALJ: Gerald F. Kelly (Assigned July 2, 2024) Commissioner: (Assigned July 2, 2024)
K.24-07-007	Mexicoach Inc. Active (TCP 36804) (PSG 5956)	Citation T.24-05-007 for \$20,000 served on May 23, 2024. Filed July 12, 2024. ALJ: Patrick Petersen (Assigned July 23, 2024) Commissioner: (July 23, 2024). On September 23, 2024, ALJ ruled granting consumer protection and enforcement division’s motion to file its confidential filing under seal
K.24-07-015	Erhan Kantarci DBA Welcome Limousine U. S., Walnut Creek. Revoked (TCP 37165)	Citation T.24-05-006 for \$4,000 served on May 28, 2024. ALJ: Kieuchinh Tran (Assigned Aug 6, 2024). Appeal hearing scheduled for November 5, 2024.
K.24-08-006	Jeff Flynn (Unlicensed)	Citation T.24-07-003 for \$1,000 served on July 23, 2024. ALJ: Patricia B. Miles (Assigned Aug 20, 2024)

Table 6. TEB Field and Airport Operations – Total Vehicles Observed⁴

⁴ Effective January 2024, TEB will submit data based on the calendar year.

MONTHLY ACTIVITY REPORT – CPED

Month	Transportation Charter-Party (TCP)	Transportation Network Companies (TNC)	Passenger Stage Corporations (PSC)
January 2024	33	51	0
February 2024	22	7	1
March 2024	63	3	0
April 2024	93	90	0
May 2024	152	84	0
June 2024	118	52	0
July 2024	50	63	0
August 2024	122	310	2
September 2024	114	116	0

Table 7. Joint Operations with Law Enforcement Agencies

Agency	Operation
Cross Border Xpress Terminal (CBX)	Cross Border Xpress Terminal TCP/TNC/PSC Passenger Carrier Joint Operation
San Jose International Airport (SJC)	San Jose International Airport TCP/TNC/PSC Passenger Carrier Joint Operation
Napa District Attorney & St. Helena Police Department	Napa TCP/PSC Passenger Carrier Joint Operation
Los Angeles International Airport Police Department (LAXPD)	Los Angeles International Airport TCP/PSC Passenger Carrier Joint Operation
Santa Clara Police Department	Levi Stadium (49ers) TCP/TNC/PSC Passenger Carrier Joint Operation

UTILITIES ENFORCEMENT BRANCH (UEB)

UEB protects California utility consumers from fraud and abuse by developing enforcement mechanisms and ensuring service providers comply with consumer protection laws and regulations. UEB investigates alleged violations by utilities, including communications (both wireline and wireless), energy (both electric and gas), and water companies. When sufficient evidence of violation is uncovered, UEB brings cases before the Commission to seek appropriate penalties and remedies for consumers.

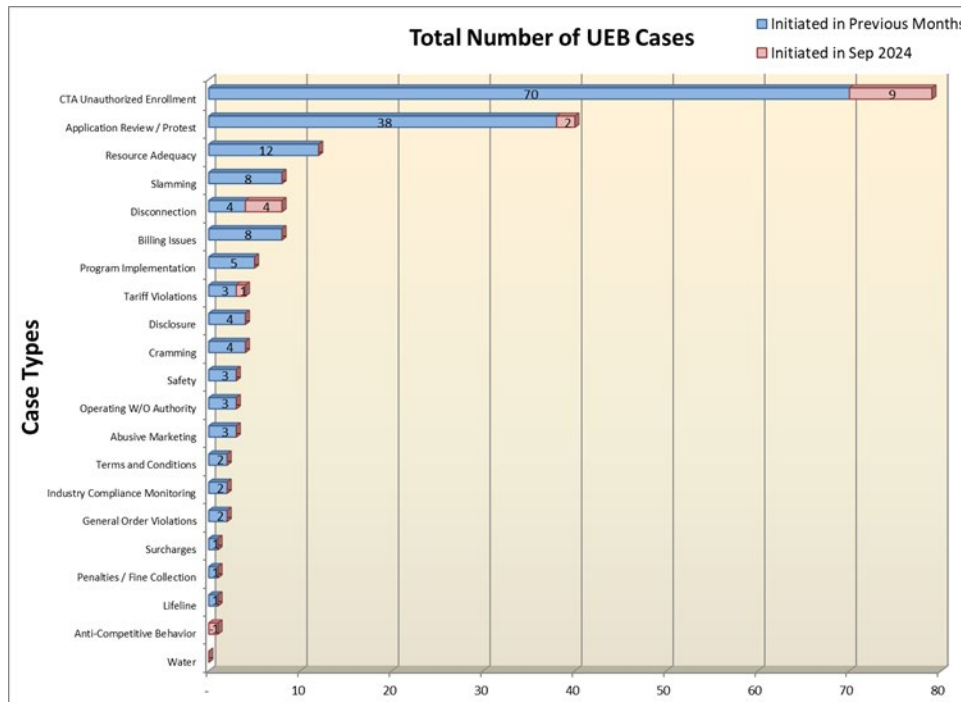
Monthly Highlights

- **Shell Energy North America (SENA) RA Citation Appeal (K.21-11-018):** On September 5, 2024, SENA submitted comments on draft resolution ALJ-463 arguing that the draft resolution is fundamentally at odds with the principles of justice and fairness that should guide all Commission decisions. On the same day, Frank Lindh sent a letter to CPUC’s chief counsel and executive director arguing that draft resolution ALJ-463 is flawed.
- **Foothill Education Technology Partnership (FETP) Administrative Enforcement Order (AEO) (H.24-02-005):** On September 6, 2024, ALJ Kelly denied FETP’s request to file a reply to CPED’s response to FETP’s motion for dismissal of the AEO for a lack of personal jurisdiction.
 - » On August 16, 2024, Creighton Grenoble of FETP entered a special appearance requesting that the Commission amend language in the AEO to conform to CPED’s discovery response and remove him from the proposed seven-year ban on participation in the Commission’s public purpose program. On August 21, 2024, CPED filed a response stating that Mr. Grenoble’s motion is procedurally improper and requesting that the Commission deny Mr. Grenoble’s motion and require that it be withdrawn and re-filed in compliance with Commission rules. On August 22, 2024, Mr. Grenoble entered another special appearance for the purpose of filing the motion to dismiss him from the AEO on the basis that the Commission lacked personal jurisdiction over him. On August 26, 2024, CPED again submitted a response requesting that the Commission deny Mr. Grenoble’s motion and require it be withdrawn and re-filed on the basis that Mr. Grenoble has not obtained party status in his personal capacity in compliance with Rule 1.4.
- **San Diego Community Power (SDCP) RA Citation Appeal (K.24-05-026):** On September 17, 2024, the Commission issued an ALJ’s ruling requiring joint responses and granting motion for leave to file under seal. The ALJ’s ruling directed SDCP and CPED to meet and confer and file a joint response addressing questions related to disputed facts and schedule by October 18, 2024.
- **AAA Natural Gas (AAA) CTA Citation Appeal (K.24-08-005):** On September 23, 2024, CPED and AAA submitted a joint statement pursuant to the ALJ’s August 20, 2024 Ruling. On September 27, 2024, the Commission issued an ALJ Ruling setting the schedule and scope of issues.

Key Activities

UEB is working on a total of 191 cases. Investigations center primarily on Core Transport Agent (CTA) Unauthorized Enrollment, Application Review/Protest, and Resource Adequacy. UEB’s cases come from a variety of sources, with Inter-Division referrals and UEB’s own scanning activities playing key roles.

Figure 5. UEB Total Number of Cases by Type as of September 30, 2024



Citations/Fines/Reparation

UEB issued one CTA citation in the month of September to StateWise Energy California, LLC for \$1,000 for its failure to provide proof of enrollment authorization.

Cumulative 2024 fines, reparations and penalties imposed from UEB’s cases are shown below.

Table 8. UEB Fines, Reparations, and Penalties

Date	Citations/Fines/Reparation
January to August 2024	\$16,848,471

September 2024	\$1,000
Cumulative 2024	\$16,849,471

- Resource Adequacy (RA) Citation Program:** UEB issues citations and levies fines to enforce Load Serving Entities’ (LSE) compliance with system, local, and flexible resource adequacy requirements pursuant to Resolution E-4195, as modified by Decisions 10-06-036, Decisions 10-06-038, 11-06-022, 14-06-050, 19-06-026, 20-06-031, 21-06-029, 22-06-050 and 23-06-029. For the month of September 2024, UEB did not issue any RA citations.
- Disconnection Citation Program:** UEB issues citations to enforce compliance with the disconnections-related consumer protection rules in D.20-06-003. This citation program is applicable to Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas), collectively referred to as California’s large investor-owned utilities (IOUs).
- Core Transport Agent (CTA):** UEB reviews CTA-related complaints received by the Commission to enforce compliance with the standards for verification of change in provider requirements in D. 18-02-002, and to identify acts constituting grounds for suspension or revocation of registration pursuant to Pub. Util. Code Section 983.5.

In September, UEB reviewed 174 CTA-related complaints that Consumer Affairs Branch (CAB) received in September 2024 and identified 43 needing investigation for potential unauthorized enrollment. Staff issued 9 data requests for proof of enrollment authorizations. UEB received proof of enrollment authorizations for 40 customers; and 3 customers were not enrolled with the subject CTA. Staff is also contacting customers to confirm the legitimacy of the proof of authorizations. Therefore, staff investigation of the September complaints is still ongoing.

On September 26, 2024, UEB issued StateWise Energy California, LLC Citation No. UEB-003-0195 in the amount of \$1,000.

Table 9. UEB CTA-Related Complaints

Month Received	CTA-Related Complaints		Data Requests Issued	Proof of Authorization Obtained	Citations Issued	Cease and Desist Letters Issued
	Total Reviewed	Unauthorized Enrollment				
September	174	43	9	40	1	0

Compliance with Ordering Paragraphs

There were no new Ordering Paragraphs added to UEB’s COPS tracker for the month of September. UEB was responsible for 41 separate Ordering Paragraphs. As of September 2024, 41 of the Ordering Paragraphs (representing 100%) have been complied with, thus none are out of compliance.

Ordering Paragraphs related to UEB’s work are attributable to the imposition of fines, adoption of settlements, ordering of consumer refunds or reparation and other remedies and corrective actions, including reporting requirements, resulting from UEB’s investigations of violations of law and wrongdoing against consumers.

The numbers reported above tracks compliance with ordering paragraphs assigned to UEB and do not include tracking for compliance with payment of fines, penalties, surcharges, or the like, which are assigned to Fiscal Office under the COPs system. However, UEB staff also tracks such payments separately in our case management system and informs fiscal of any identified issues.

UEB-Related Proceedings

Table 10. UEB-Related Proceedings

Proceeding	Description	ALJ	Commissioner
R.18-07-005	Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.	Kelly	Houck
K.19-03-024	Appeal of San Jose Clean Energy to Citation E-4195- 0052 issued on February 27, 2019 by the Consumer Protection and Enforcement Division.	Kim	N/A
K.21-11-018	Appeal of Shell Energy North America to citation E-4195-113 issued on October 21, 2021 by Consumer Protection & Enforcement Division.	Cai	N/A
I.22-10-007	Order Instituting Investigation into the Operations and Practices of TC Telephone and Order to Show Cause to Determine Whether Respondents Violated the Laws, Rules, and Regulations Governing the California Universal LifeLine Program	Mason	Shiroma
A.22-11-011	Application of Kloud Communications, Inc. for Registration as an Interexchange Carrier Telephone Corporation pursuant to the Provisions of Public Utilities Code Section 1013.	Wilson	Shiroma

K.23-11-015	Appeal of Silicon Valley Clean Energy to citation E-4195-143 issued on October 27, 2023 by Consumer Protection & Enforcement Division.	Goldberg	N/A
K.24-02-001	Appeal of Desert Community Energy to citation E-4195-157 issued on January 3, 2023 by Consumer Protection & Enforcement Division.	Chiv	N/A
H.24-02-005	Request of FETP For Hearing on AEO for Violation of California Teleconnect Fund Program Rules.	Kelly	N/A
K.24-05-026	Appeal of San Diego Community Power to citation E-4195-0173 issued on April 30, 2024 by Consumer Protection & Enforcement Division	Afary	N/A
K.24-08-005	Appeal of AAA Natural Gas to citation UEB-003-0197 on July 5, 2024 by the Consumer Protection and Enforcement Division	Chiv	N/A

Outreach/Training/Other Activities

SNAP Summary: On September 9, 2024, the FCC provided an overview of the Affordability Connectivity Program (June 1, 2024) wind down. The FCC collected data from the program participants during the 2 ½ year program. It is reviewing and analyzing the data and will release the results to the public. At its peak, approximately 23 million households received funding from the ACP program. Overall, the program was found effective in keeping vulnerable populations from losing connectivity. It is unknown at this time if Congress will reintroduce legislation to restart the program.