

Transportation Licensing and Analysis Branch (TLAB) *Advice Letter Process*

Clean Miles Standard Program
For External Use

Clean Miles Program Team
May 2024



California Public
Utilities Commission

Preparing the Advice Letter

Step 1. Prepare the Advice Letter (AL)

An AL filing has four key components:



1.1 AL summary form



1.2 Cover sheet



1.3 Service List



1.4 Supporting documents

Step 1. Prepare the Advice Letter (AL) (cont.)



1.1 Complete the AL summary form

- ✓ **Template Provided by CPED**
- ✓ **AL Filing must be filed sequentially regardless of the program (i.e., AV, Access for All or other)**
- ✓ **Number [1, 2, 3...] for the original AL**
- ✓ **Number & Letter [1A, 1B, 1C...] for the supplemental AL**
- ✓ **Follow the naming convention:**
 - **Original: [5-Digit TCP Number] [TNC Name] [AL Number]** e.g. 12345 XYZ AL 1 (for the first AL filing, begin numbering at 1)
 - **Supplement: [5-Digit TCP Number] [TNC Name] [AL # Letter]** e.g. 12345 XYZ AL 1A (for the first AL filing, begin numbering at 1A)

CALIFORNIA PUBLIC UTILITIES COMMISSION Consumer Protection and Enforcement Division Passenger Transportation Carrier Advice Letter (AL) Summary Form

PASSENGER TRANSPORTATION CARRIER FILER INFORMATION

Date of Submission:	Date AL served on parties:	
Carrier Name:	PSG #:	
DBA Name:		
Address:		
City:	State:	ZIP Code:
Filer's Name: First, Last		
Filer's Email:	Filer's Phone:	

AL INFORMATION

Advice Letter #:	Requested Effective Date:	AL Tier: <input type="checkbox"/> I <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> Information Only
Subject of filing:		
Authorization for filing: Resolution #, Decision #, etc.		
Notes/comments: Other information & reference to advice letter, etc.		

SUBMISSION INFORMATION

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.

Questions regarding the Access for All Program Advice Letter filings, please email:
tncaccess@cpuc.ca.gov

Questions regarding the Autonomous Vehicle Passenger Service Programs Advice Letter filings, please email:
AVPrograms@cpuc.ca.gov

Questions regarding the Clean Miles Standard Advice Letter filings, please email:
CleanMiles@cpuc.ca.gov

Questions regarding the Transportation Network Companies general Advice Letter filings, please email:
Licensing_TNC@cpuc.ca.gov

Step 1. Prepare the Advice Letter (AL) (cont.)



1.2 Prepare AL cover letter

- ✓ A cover letter summarizes the content of the advice letter.
- ✓ Per GO 96-B, an incomplete cover letter may result in rejection of the AL filing.

Step 1. Prepare the Advice Letter (AL) (cont.)

What should a cover letter contain?



An incomplete AL cover letter sheet may result in rejection of the AL filing

A. Date of submission

April 15, 2023
ABC Transportation
Advice Letter No. 1

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

B. Brief description of the AL

Pursuant to Decision (D.) XX-XX-XXX, ABC Transportation submits this Advice Letter No. 1 to submit a plan. The purpose of this filing is to submit the statutorily required plan. The requested effective date is May 15, 2023 (30 days from date of filing).

C. CPUC authority (decisions, resolutions, GO, PU Codes, etc.)

Per D.XX-XX-XXX, this Advice Letter is submitted as a Tier 2 filing in accordance with G.O. 96-B. ABC Transportation requests that this advice letter become effective same day as submission date, April 15, 2023. ABC Transportation provides the following documents in support of its request:

1. Program Plan
2. (Include here other supporting documents)

D. Effective date

In compliance with General Order 96-B, we served a copy of this advice letter via email upon the parties identified on the attached R.21-11-014 service list on April 15, 2023. If there are any questions regarding this advice letter, please contact _____ (CMS Regulated Entity's contact info).

E. Date served on parties

Any Party can protest or respond to this advice letter by sending a written protest or response via email to CPED at CleanMiles@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 CMS Regulated Entity on the same day.

Email a copy of the protest or response to this advice letter to John Smith (TNC contact person) at _____ (CMS Regulated Entity email address).

F. Language about filing and serving the protest or response

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 HAS BEEN EXAMINED BY ME AND IS TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Yours truly,

John Smith
Title
ABC Transportation

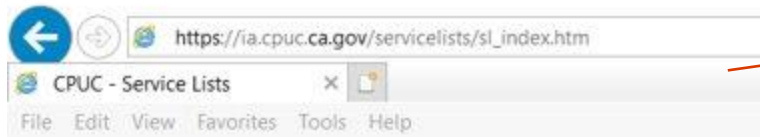
Attachments

Step 1. Prepare the Advice Letter (AL) (cont.)



1.3 Obtain the Programs' service list

Pursuant to GO 96-B AL must be serviced to the appropriate Service List which can be found at: https://ia.cpuc.ca.gov/servicelists/sl_index.htm



A. For example, for the Access Program, go to the [service list](#) site

R2110001 LIST	27-OCT-2023	CPUC
R2110002 LIST	10-APR-2024	CPUC
R2111014 LIST	08-APR-2024	CPUC
R2202002 LIST	14-MAR-2024	CPUC

B. Select appropriate proceeding number from the list

Step 1. Prepare the Advice Letter (AL) (cont.)



Where and how to download the service list?

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R2111014 - CPUC - OIR TO IMPEM
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: APRIL 8, 2024

[Download the Comma-delimited File](#)
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

Parties

HUGO FOZZATI
AUTOX
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: AUTOX

JANEE WEAVER
COUNSEL - REGULATORY
LYFT, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: LYFT, INC.

KERAN
PAWAR TRANSPORTATION LLC
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: PAWAR TRANSPORTATION LLC (SPECTRA
DRIVE)

MIKE
ONWARD CARE INC.
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: ONWARD CARE INC.

C. Download the list

D. Open in Excel and save as PDF
and attach with AL Filing

Step 1. Prepare the Advice Letter (AL) (cont.)



1.4 Prepare supporting documents

- ✓ **Supporting documents vary by the type of AL request and varies by program.**
- ✓ **For program specifics, please reach out to the following:**
 - TNC Access for All: tncaccess@cpuc.ca.gov
 - Autonomous Vehicle: AVPrograms@cpuc.ca.gov
 - Clean Miles Standard: CleanMiles@cpuc.ca.gov
 - TNC specific filings: Licensing_TNC@cpuc.ca.gov

Filing Requirements

Step 2. Filing Requirements

PDF/Excel Format



File Name Format



PDF/A Compliance



File Size



Email Subject



Email Body



Step 2. Filing Requirements



2.1 PDF/Excel file formatting – combine all the PDF documents into a single PDF file and keep all the Excel docs (if any) in a single Excel file

PDF documents

1. AL summary form
2. AL cover letter
3. Service list
4. Other supporting documents

Excel documents

1. Excel documents if any

Step 2. Filing Requirements (cont.)



2.2 File name format – name the 2 file attachments with these naming conventions

Original AL filing

- PDF Packet
 - [5-Digit TCP Number] [TNC Name]
[AL Number] [Forms]
 - e.g. 12345 XYZ AL 1 Forms
- Excel Packet (if any)
 - [5-Digit TCP Number] [TNC Name]
[AL Number] [Data]
 - e.g. 12345 XYZ AL 1 Data

Supplemental filing

- PDF Packet
 - [5-Digit TCP Number] [TNC Name]
[AL # Letter] [Supplement Forms]
 - e.g. 12345 XYZ AL 1A Supplement Forms
- Excel Packet (if any)
 - [5-Digit TCP Number] [TNC Name]
[AL # Letter] [Supplement Data]
 - e.g. 12345 XYZ AL 1A Supplement Data

Step 2. Filing Requirements (cont.)



2.3 PDF/A compliance – ensure that the PDF packet is PDF/A compliant

How to make PDF documents PDF/A compliant?

Adobe Acrobat

<https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

Nitro

<https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>

Step 2. Filing Requirements (cont.)



2.4 File size – Follow file size limit

Size limit

- 5 MB per email

What if file is >5 MB?

- Use CPUC's sFTP

How to use sFTP?

- Info on how to set up a Kiteworks account & upload files is available [here](#)

Submit AL

- [Log in here](#) if you already have an account

Step 2. Filing Requirements (cont.)



2.5 Email subject format – follow these examples for email subject

Original AL Filing

- [TNC Name] [AL #]
- e.g. XYZ AL 1

Supplement Filing

- [TNC Name] [AL # Letter] [Supplement]
- e.g. XYZ AL 1A Supplement

Note: Use the same email subject format if sending via CPUC's sFTP.

Step 2. Filing Requirements (cont.)





2.6 Email body – follow the example below

To CleanMiles@cpuc.ca.gov **Bcc**

Cc [Service List]

XYZ AL 1

 12345 XYZ AL1 Forms.pdf
137 KB

 12345 XYZ AL1 Data.xlsx
23 KB

To CPED and Service List:

XYZ submits this advice letter on XXXX. Please find the two attached documents related to this filing.

For questions on this filing, please contact John Smith at 514-500-5000 or jsmith@xyz.com.

Step 2. Filing Requirements (cont.)

2.7 Cut off times and confirmation

- ✓ The **cut off time** to be considered filed the same day as submitted is **5:00 PM PST**.
- ✓ Filings received by the Consumer Protection and Enforcement Division (CPEd) **after 5:00 PM PST** or on a **non-business** day will be considered filed the **following** business day.

Protests/Responses or Replies

Step 1. Prepare the protest/response or reply

1.1 Protest/response and reply basics

- ✓ General Order 96-B (General Rule 7.4) provides the grounds and requirements for a protest/response or reply to an advice letter
- ✓ File a protest/response within 20 days of the AL's submission date
- ✓ A carrier shall reply to each protest within 5 business days after the end of the protest period.
- ✓ The protestor cannot reply to the TNC's reply
- ✓ Protests/responses and replies are not required to be served on the service list but are required to be served to the reviewing industry and the party/utility affected.

Step 1. Prepare the protest/response or reply (cont.)

1.2 Key components



**Protest/response
or reply letter in
PDF**



**Supporting
documents in PDF
(if any)**

- ✓ Summary form and cover letter are not needed when filing a protest/response or reply
- ✓ Protest/response or reply is not required to be served on the service list per G.O. 96-B

Step 2. Filing Requirements

2.1 File name format – name the 2 file attachments with these name conventions

Protest

- **[Protest by] [Protester's Name] [TNC Name] [AL #]**
e.g. Protest by Cal Alliance XYZ AL 1

Response

- **[Response to] [Responder's Name] [TNC Name] [AL #]**
e.g. Response to SFMTA XYZ AL 1

Reply

- **[Reply to] [Protester's Name] [TNC Name] [AL #]**
e.g. Reply to Cal Alliance XYZ AL 1

Step 2. Filing Requirements (cont.)

2.2 PDF/A compliance – ensure that the PDF packet is PDF/A compliant

How to make PDF documents PDF/A compliant?

Adobe Acrobat

<https://helpx.adobe.com/acrobat/using/pdf-x-pdf-a-pdf.html>

Nitro

<https://www.gonitro.com/user-guide/pro/article/create-a-pdf-a-file>

Step 2. Filing Requirements (cont.)

2.3 File size – Follow file size limit (this is less likely to become an issue for protest filings)

Size limit

- 5 MB per email

What if file is >5 MB?

- Use CPUC's sFTP

How to use sFTP?

- Info on how to set up a Kiteworks account & upload files is available [here](#)

Submit AL

- [Log in here](#) if you already have an account

Step 3. Submit via email

3.1 Email the protest/response or reply filing to the following entities

Protest
<ul style="list-style-type: none">• CPED• CMS Regulated Entity

Response
<ul style="list-style-type: none">• CPED• CMS Regulated Entity

Reply
<ul style="list-style-type: none">• CPED• Protester or Responder

Step 3. Submit via email (cont.)

3.2 Cut off times and confirmation

- ✓ The **cut off time** to be considered filed the same day as submitted is **5:00 PM PST**.
- ✓ Filings received by the Consumer Protection and Enforcement Division (CPEd) **after 5:00 PM PST** or on a **non-business** day will be considered filed the **following** business day.