

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: November 15, 2024	Date AL served on parties: 11/15/2024
Carrier Name: HopSkipDrive, Inc.	PSG #: 0034668
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AL INFORMATION

Advice Letter #: 2A - Public	Requested Effective Date: N/A	AL Tier: <input type="checkbox"/> I <input type="checkbox"/> II <input checked="" type="checkbox"/> III <input type="checkbox"/> Information Only
Subject of filing: Tier 3 Advice Letter with Attachments - Interim GHG Plan and Regulatory Fee - submitted pursuant to D.24-03-001.		
Authorization for filing: Resolution #, Decision #, etc. Decision 24-03-001		
Notes/comments: Other information & reference to advice letter, etc. HopSkipDrive is submitting a supplement to public version of Advice Letter 2A in response to staff request. Advice Letter 2A is being sent to cleanmiles@cpuc.ca.gov and service list for R 21-11-014		

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



November 15, 2024

VIA EMAIL

E: CLEANMILES@CPUC.CA.GOV
California Public Utilities Commission
Transportation Licensing and Analysis Branch
505 Van Ness Avenue
San Francisco, CA 94102

RE: **HopSkipDrive, Inc. (PSG0034668) – Supplemental Tier 3 Advice
Letter No. 2A**

To Whom It May Concern,

Pursuant to Decision 24-03-001, on July 5, 2024, HopSkipDrive, Inc. (“HopSkipDrive”) submitted Advice Letter 2 to the California Public Utilities Commission (the “Commission”). In Advice Letter 2, HopSkipDrive requested approval of HopSkipDrive’s Interim GHG Reduction Plan which was attached thereto as Attachment 1 (“Interim Plan”).

This Advice Letter 2A is being submitted in response to staff’s request and provides additional information regarding Action Plan Contributions, Drivers Using the HopSkipDrive Platform, Environmental and Social Justice Plan and Charging Infrastructure, Marketing Education and Outreach and Clean Mobility. HopSkipDrive has supplemented the Interim Plan it initially submitted and is submitting a revised version of such as set forth in Attachment 1, attached hereto (“Updated Interim Plan”). The Updated Interim Plan replaces the Interim Plan in Advice Letter 2A Attachment 1, and no other changes are being made to Advice Letter 2.

Pursuant to General Order 96-B, General Rule 7.5.1, HopSkipDrive requests that the Commission maintain the current protest and comment period for Advice Letter No. 2

This Advice Letter is submitted in accordance with G.O. 96-B and Decision 24-03-001 is being served via email upon the parties identified on the attached R.21-11-014 service list and any person that has previously requested service of HopSkipDrive advice letters.

If there are any questions regarding this advice letter, please contact the undersigned.

Respectfully submitted,
/s/ Nicole Hampton
Nicole Hampton
Director, Legal - Compliance & Labor

Enclosures
cc: R. 21-11-014 Service List

ATTACHMENT 1
HopSkipDrive, Inc. (PSG0034668) Tier 3 Advice Letter No. 2A
Updated Interim Plan

Interim Greenhouse Gas Emissions Reduction Plan of HopSkipDrive

Submitted July 5, 2024

Updated: November 15, 2024

Executive Summary

HopSkipDrive is committed to reducing greenhouse gas (“GHG”) emissions and increasing the use of zero-emission vehicles (“ZEVs”) in alignment with California’s Clean Miles Standard (“CMS”) and to support the strengthening of the communities where it operates.

HopSkipDrive is committed to clean youth transportation. More than a third of vehicle miles currently traveled on the HopSkipDrive platform are in clean vehicles (electric, hybrid, or fuel cell), and HopSkipDrive platform vehicles are 4.7 times more fuel efficient than a diesel bus. By way of example, in the eight months since launching SmartPooling, a product that increases the pooling of rides scheduled by school district organizers, school districts saved 160,000 pounds of CO₂ as a result of reducing single occupancy rides and matching students together for transportation. School districts using this feature were able to more efficiently leverage supplemental school transportation options to smartly operate their systems. These districts then had more avenues to utilize their buses effectively and on dense routes, ultimately reducing inefficient supplemental rides by 280,000 miles.

As a technology company solving complex transportation challenges where there is a heightened need for safety, equity and care, our rides are all prearranged— typically at least eight (8) hours in advance. Drivers on the HopSkipDrive platform, known as CareDrivers, typically engage, on average, one fourth of the typical time a driver would spend on larger transportation network company (“TNC”) platforms, namely, Uber or Lyft. HopSkipDrive anticipates most near-term conversions to ZEVs by CareDrivers will come from drivers who also provide transportation on Uber and/or Lyft platforms, in large part as a result of their increased ability to obtain access to the CMS DAP. However, consistent with the requirements outlined in Decision 24-03-001, HopSkipDrive outlines in this Interim GHG Plan (“Interim Plan”) the strategies and actions it will separately implement, in addition to the Drivers Assistance Program (“DAP”), to meet the annual targets set by the California Air Resources Board (“CARB”) until its next GHG Plan is filed within 90 days of an effective date of a Phase II Decision in this proceeding.¹ This plan focuses on minimizing the impact on low- and moderate-income (“LMI”) drivers while advancing clean mobility goals and supporting Environmental and Social Justice (“ESJ”) communities. HopSkipDrive is proud to have exceeded 2023 CARB targets and to be on track to exceed 2024 targets as well. Miles driven by electric vehicles in 2023 made up 8 percent of miles traveled by

¹ Based upon the parallel timeline for potentially filing a full GHG Plan by January 15, 2026, as opposed to following a Phase II Decision, data and goals through the end of 2025 are contemplated herein for clarity. *See*, D. 24-03-001, at 78.

HopSkipDrive’s CareDriver network in California, vastly exceeding by 400 percent CARB’s 2023 target of 2 percent.

Study/Plan Design for Achieving Targets

The Interim Plan was developed through a comprehensive analysis of HopSkipDrive’s current operations, emissions data, and potential areas for improvement. HopSkipDrive utilized advanced data analytics to identify key factors influencing GHG emissions and electric vehicle miles traveled (“eVMT”). The plan incorporates stakeholder feedback, regulatory requirements, and best practices in sustainable transportation to establish realistic and achievable targets for each year. Our compliance strategy focuses on meeting the GHG and eVMT targets set by the CARB. This includes detailed actions, educational resources, and partnerships designed to support CareDrivers in transitioning to ZEVs.

Action Plan

The Action Plan described herein includes a series of measures designed to meet the GHG emission and eVMT targets while minimizing negative impacts on LMI drivers. To advance clean mobility goals, HopSkipDrive will find solutions on educating the driver community through educational outreach and potential partnerships. HopSkipDrive’s analysis of 2023 and 2024 historical data informs a position that anticipates organic transition to ZEVs by CareDrivers will continue to allow HopSkipDrive to maintain compliance with CARB annual targets through its 2026 data report (on 2025 trip data). This does not consider the number of CareDrivers who may also be able to access the DAP. Finally, HopSkipDrive has credits from its 2024 data report (on 2023 trip data) and anticipates additional credits will be available to it from its 2025 data report (on 2024 trip data). Therefore, HopSkipDrive approaches the action plans included herein with that projection in mind, focusing more heavily on long-term plans to support compliance in later years, particularly as a small TNC with limited resources and staff capacity. HopSkipDrive recognizes the need to closely monitor its progress toward annual targets to ensure this assumption is correct and does not require a modification of action plans to accelerate progress. These actions are categorized as follows:

1. Annual Targets

At the outset, this plan is informed by HopSkipDrive data around patterns for drivers on the platform. indicates that most drivers on the platform have short driving windows primarily before and after school hours, and the average driver is active on the HopSkipDrive platform for approximately six (6) hours per week. This shorter driving window presents a challenge as the vast majority of the time, the vehicles being used to provide rides on the HopSkipDrive platform are being used for other purposes outside of the platform. Recognizing this, HopSkipDrive intends to use its existing data on activity patterns, including hours driven, typical driving times, and vehicle types, to inform each component of this action plan. This approach is intended to enhance outreach

by tailoring content to the actual needs and schedules of drivers, increasing the likelihood of successful ZEV adoption and retention in the community.

- a. Education & Outreach: HopSkipDrive will begin implementation of educational campaigns, beginning no later than the first quarter of 2025, to inform California drivers of the benefits and incentives of transitioning to ZEVs. This campaign will emphasize the benefits of ZEVs specifically for TNC drivers, cost savings and incentive availability (to complement the education that will be available through the DAP), and efficient driving techniques. These campaigns will be achieved through a variety of online learning and resources, including tutorials, webinars, and e-mail communications with multilingual support. Early outreach will work to inform any additional languages in which materials may need to be made available. The campaign will also be targeted to CareDrivers based on data regarding their driving patterns and time on the platform.
 - i. Estimate of action's contribution to meeting goal: Medium
Because HopSkipDrive has done no education and outreach on ZEV transition to this point, it anticipates the initial delta of this work will have a significant impact on driver behaviors.

- b. Promoting Shared Rides: By promoting shared rides, HopSkipDrive can reduce the number of eVMT and subsequently lower emissions. HopSkipDrive is investigating its ability to make this commitment most effective through specifically promoting shared rides within ZEVs.
 - i. Estimate of action's contribution to meeting goal: High
Due to HopSkipDrive's pre-arranged ride model, promoting and incentivizing shared rides, potentially even by vehicle type, provides an opportunity to have a high impact on HopSkipDrive's ability to meet the CARB goals.

- c. Partnerships and/or Driver Incentives: HopSkipDrive recognizes the important role of clean mobility in strengthening the communities in which it operates. HopSkipDrive is continuing to investigate the most effective and appropriate manner of further incentivizing CareDrivers to transition to ZEVs. Incentives under consideration include promotional offerings for CareDrivers completing a certain number of rides in a ZEV and partnerships with third party companies that would benefit drivers' maintenance of ZEVs. HopSkipDrive will collect additional data from CareDrivers in the second half of 2024 to support this decision-making and allow HopSkipDrive to have a data-driven indication of how much each action will support achievement of CARB annual targets. As a small TNC, providing such incentives can have a more significant impact on HopSkipDrive's ability to arrange

affordable rides to individuals in need of specialized, TNC-K platforms, which supports a measured approach that takes into account HopSkipDrive's current compliance.

- i. Estimate of action's contribution to meeting goal: Low at this time Because HopSkipDrive is a small TNC with limited resources, it anticipates that its current ability to financially support partnerships and driver incentives may result in this work having an overall low impact. However, because drivers on the platform are generally active during consolidated periods of time around school hours, the company is investigating whether it can improve this estimate with more targeted incentive work that takes these consolidated periods into account. For example, HopSkipDrive is considering whether charging partnerships in areas with significant volume of regular drop-offs or during peak hours for CareDrivers may be viable and more directly targeted to CareDrivers.

2. LMI Drivers

- a. The Commission has defined an "LMI Driver" as a "driver whose household income is at or below 400 percent of the federal poverty level."² HopSkipDrive does not currently identify LMI Drivers as it promotes an equitable driver community. Based on 2024 anonymized data on driver income levels across California, there are a significant percentage of drivers within ZIP codes in areas identified by the state as LMI. HopSkipDrive is investigating how to build more anonymous identification patterns to better understand what an LMI driver profile is for the platform and how education and outreach can be tailored to those drivers' needs. Furthermore, HopSkipDrive can work with broad input of the CareDriver community to ensure that educational outreach programs and potential incentives/partnerships are not only accessible, but affirmatively promoted, to drivers that may be identified as LMI Drivers. No portions of the action plan currently contemplated are anticipated to disproportionately impact LMI Drivers.

2. Clean Mobility

HopSkipDrive's mission is to create opportunities for *all* through mobility. As a mission-driven organization, HopSkipDrive is dedicated to making a difference in the lives of children and families, as transportation can be the difference between success and struggle for kids traveling to school every day. Specifically, HopSkipDrive's advance booking model supports equitable access to services for student riders, aligning with its mission to provide transportation solutions for children and school districts. We help reduce the cost and drive time incurred by larger

² D. 24-03-001, at 23.

transportation methods like school buses or vans. Our business model supports student riders needing reliable and safe transportation but our clients are school districts and nonprofits.

- a. Rides on the HopSkipDrive platform are typically booked at least six (6) hours in advance and are often organized by a school district or non-profit organization. The nature of HopSkipDrive's work is designed, in this way, at its core to support access for LMI riders and communities, and no portions of the action plan contemplated herein are anticipated to impact that access. Put another way, because rides are pre-arranged, HopSkipDrive believes there is less risk of drivers in clean vehicles failing to accept rides in LMI communities. In 2023, 38% of California riders on the HopSkipDrive platform were youth experiencing homelessness, foster youth, or students with disabilities, and Los Angeles foster youth alone were driven over 700,000 miles.
 - i. HopSkipDrive intends to complete additional data analysis in 2025 to evaluate the current ride volumes of clean vehicles in LMI communities to further target outreach and planning efforts.
- b. Current data indicates most drivers operate primarily during school hours, implying more predictable patterns that could simplify ZEV charging logistics. Plans will include gathering more details on ZEV-specific needs, including charging availability and performance for extended trips.

3. ESJ Action Plan & Charging Infrastructure

HopSkipDrive does not currently plan to invest directly in building any charging infrastructure but acknowledges the importance of access to charging stations, particularly for LMI drivers. It will focus on identifying barriers to ZEV adoption among these drivers, including access to nearby charging points, and will explore partnerships with entities that may provide these resources. Engagement with non-profit organizations in underserved communities will also support the goal of equitable access to clean mobility solutions.

- a. Commitment of HopSkipDrive: HopSkipDrive is committed to aligning with the Commission's Environmental and Social Justice (ESJ) Action Plan through minimizing impact on LMI riders and communities. We understand that the ESJ Action Plan is a critical framework designed to address and rectify the disparities faced by underserved communities, which include low-income households and communities of color. These populations often experience higher exposure to environmental hazards and have limited access to clean, safe, and affordable utility services. HopSkipDrive has not proposed, within this Interim Plan, any algorithm or platform qualification changes that would negatively impact LMI drivers.

- b. Non-profit engagement: The ESJ Action Plan emphasizes the necessity for equitable policy-making and investment to ensure these communities benefit from environmental regulations and socio-economic improvements. HopSkipDrive will engage with non-profit organizations focused on sustainability and social justice in the second half of 2024 to promote clean mobility initiatives and support LMI communities.

- 4. Marketing, Education, and Outreach:
 - a. As described in the Annual Targets section above, HopSkipDrive intends to launch targeted marketing campaigns regarding the benefits of ZEVs specifically for TNC drivers, cost savings and incentive availability (to complement the education that will be available through the DAP), and efficient driving techniques in the first quarter of 2025 or as soon as DAP information is available, if later, as HopSkipDrive believes it will be most efficient as a small TNC to also be able to market its availability at the same time. HopSkipDrive is currently developing educational resources and support for its driver population regarding HopSkipDrive's sustainability goals, CMS annual targets, and drivers' role in the same. To support this, HopSkipDrive intended to use existing data on driver activity patterns, including hours driven, typical driving times, and vehicle types, to inform the development of educational materials and incentives. This approach is intended to enhance outreach by tailoring content to the actual needs and schedules of drivers, increasing the likelihood of successful ZEV adoption and retention in local communities. HopSkipDrive also supports the creation of education materials for all TNC drivers by the Commission or Program Administrator regarding the requirements, once established, for access to the DAP and potential incentives available there for distribution. HopSkipDrive intends to have its educational resources available to CareDrivers by the end of 2024, with another point of contact once details of the DAP are available. The communication regarding the DAP will also remind drivers of the HopSkipDrive-specific support available and reinforce learnings from the initial resources. These resources will also be automatically provided to all new drivers on the platform in the future.

 - b. HopSkipDrive plans to deliver targeted educational campaigns that promote the benefits of ZEVs, cost savings, and available incentives. Materials will specifically try to address barriers to adopting ZEV by highlighting the cost benefits of transitioning to ZEVs, potential savings in maintenance, and incentives available through partnerships. These materials will be accessible in English and if early survey and forum outreach indicates a need, HopSkipDrive will work on providing

materials in those languages to ensure inclusivity based on feedback from the driver community.

Anticipated Barriers and Minimization Proposals

Transitioning to ZEVs involves several challenges that need to be addressed to ensure a smooth and effective transition.

- a. Lack of access to DAP for drivers on Small TNC platforms: As discussed earlier in this Interim Plan, because drivers' eligibility for the DAP includes rides performed across all CMS Regulated Entities, the DAP incentives may be inaccessible to a disproportionate number of drivers who exclusively access a small TNC platform, such as HopSkipDrive. HopSkipDrive will educate drivers on the ways to optimize their ability to access DAP incentives.
- b. Lack of awareness: Many members of the driver community are unaware of the benefits of ZEVs, have misconceptions about their reliability and cost-effectiveness, or are understandably concerned with presumed cost.
 - i. HopSkipDrive currently organizes local community gatherings to engage in improving the driver community experience. HopSkipDrive intends to source partners to provide Q&A forums at these gatherings where the driver community can engage regarding ZEVs as part of a larger event.
 - ii. HopSkipDrive will incorporate into its educational and marketing materials the cost-benefit analyses of long-term savings and benefits of ZEVs.
- c. Vehicle performance for business use/local infrastructure: Range anxiety and vehicle performance concerns are common concerns for first-time ZEV owners, particularly for those utilizing their vehicles for business purposes like TNC drivers. Insufficient charging stations are a concern, especially in underserved and LMI communities.
 - i. HopSkipDrive will explore technology solutions to further optimize our routing systems and reduce unnecessary mileage to ensure that ZEVs are used within their optimal range.

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Supplemental Calculations

a. Regulatory Fee Assumptions

- Trip and mileage forecasts are set to grow each year at a specific growth rate based on the previous year's trips and methodology is based on HopSkipDrive's long-range plan, a protected and confidential trade secret.
- **NumDrivers** - These numbers, protected by trade secret, include a calculation based on the forecasted trips described above divided by the average trips per driver. Average trips per driver between January 1, 2024 to June 30, 2024 were used. That rate was kept static and assumed that the average trips per driver will be the same each year. This also assumes that each driver will only drive one vehicle at a time.
- **NumTrips** - These numbers, protected by trade secret, include a trip forecast set to grow each year at a specific growth rate based on the previous year's trips and methodology based on HopSkipDrive's long-range plan, a protected and confidential trade secret.
- **DriversTransitionPercent** - This number was generated by using historical California ZEV sales and forecasting it forward using a flat growth amount of 98,728 (which is the average growth of ZEV sales between 2020 and 2023). The total fleet size of California using the average growth rate between 2016 and 2022 was then forecasted forward. The ratio of ZEV sales divided by the fleet size is the adoption rate for California as a whole. Based on a comparison to limited internal data, this ratio was left static. For example, in California we calculated that in 2024, 1.4% of users will switch to a ZEV and HopSkipDrive data anticipates 2.64% of users switching to a ZEV. This means that CareDrivers are adopting a ZEV at a rate of 88.5% more than California as a whole. So, this 88.5% was then applied to the ratio of ZEV to fleet for California in order to establish HopSkipDrive's adoption rate.
- **DriversUpfrontPercent** - Based on current trip activity of CareDrivers and existing ZEV rates, 2024 was determined based on organic volume of drivers anticipated to qualify and participate in year one. This rate was then increased year over year at a constant rate.
- **DriversOngoingPercent** - The 2024 projection anticipates that in Year 1, the majority of drivers who became eligible and participated in an upfront incentive would maintain eligibility and continue to participate for ongoing incentives. As the number of drivers accessing the upfront incentive increases, a dropoff of the ratio of drivers participating in ongoing incentives is anticipated.
- **TripEligibilityThreshold** - HopSkipDrive proposes a Trip Eligibility Threshold for access to CMS upfront and ongoing incentives based on consideration of the volume of trips completed in 2023 by CareDrivers. HopSkipDrive acknowledges that this number is likely to be significantly lower than that proposed by other,

larger TNCs, particularly since the Threshold is based upon trips across all CMS Regulated Entities.³ However, HopSkipDrive maintains concerns previously raised that a threshold set too highly will unfairly disadvantage drivers on smaller TNC platforms, like HopSkipDrive, and place a disproportionate burden on small TNCs to supplement action plans more substantially to meet CARB annual targets despite its equal relative contributions to the DAP budget.

b. GHG Plan Compliance Estimates

- **NumVeh** - These numbers, protected by trade secret, include a calculation based on the forecasted trips described above divided by the average trips per driver. Average trips per driver between January 1, 2024 to June 30, 2024 were used. That rate was kept static and assumed that the average trips per driver will be the same each year. This also assumes that each driver will only drive one vehicle at a time.
- **FleetGHG** - For each trip: CO2 emission factor (based on model year and vehicle fuel type) * VMT (vehicle miles transported). Passenger Car values were used for the CO2 factor for vehicles with a type of: Coupe, Sedan, Wagon, or Hatchback. Light Truck values were used for the CO2 factor for vehicles with a type of: SUV, Pickup, Mini-Van, or where Vehicle Type was blank. If fuel type is unknown then the largest CO2 factor for the model year was used.
- **FleetVMT** - Total vehicle miles transported for all trips in a given year. This includes period 1, period 2, and period 3 miles. HopSkipDrive has no P1 vehicles so this value is 0. Forecasted details explained previously.
- **Fleet VMTP2** - The miles split for P2 vehicles from the Fleet VMT above using the ratio of P2/P3 vehicles miles.
- **Fleet VMTP3** - The miles split for P3 vehicles from the Fleet VMT above using the ratio of P2/P3 vehicles miles.
- **CompOccupancy** - The average of the Compliance Occupancy value for each trip in the year. If passenger count for a trip was 1 then compliance occupancy is 1.5, otherwise compliance occupancy is 2.5
- **ComplianceGHG** - The calculated total fleetwide GHG (grams CO2) divided by the total PMT (passenger miles traveled). PMT is calculated by taking the compliance occupancy value for each trip and multiplying it by the Period 3 VMT. This is summed for all trips in the year.
- **NumZEVs** - Number of trips taken in a given year by BEVs and FCEVs. Used current vehicle makeup and kept this ratio static.
- **NumPHEVs** - Number of trips taken in a given year by PHEVs. Used current vehicle makeup and kept this ratio static.

³ *Id.* at 52-53.

- **NumHEVs** - Number of trips taken in a given year by HEVs. Used current vehicle makeup and kept this ratio static.
- **ComplianceEVMT** - The percent of VMT completed by BEVs or FCEVs for the year, rounded to the nearest percent. This is calculated by summing the Period 3 miles for BEV or FCEV trips for the year and dividing that by the total Period 3 miles for the year.

c. Analysis Results

With limited historical data to estimate projected transitions to ZEVs and the impact of the DAP or other action plan items, HopSkipDrive looked to its organic transition volume to ZEVs in 2023 and 2024 as a baseline. This volume indicates that in the near-term, HopSkipDrive can project a steady reduction in GHG emissions and increase in eVMT relative to fleet size and activity. Additionally, the analysis indicates that ZEV adoption by CareDrivers is higher than average ZEV adoption rates, which should predict some indication of effectiveness of targeted educational efforts. Finally, an increase in pooling of rides to minimize unnecessary mileage will most certainly enhance ZEV performance and reduce emissions. As a rapidly growing company, it is difficult for HopSkipDrive to fully account for the impacts its growth will have on projected transitions for periods following this Interim Plan. HopSkipDrive recognizes it may need to utilize credits to offset compliance beginning with its 2027 reporting (for 2026 ride data) if its action plan items do not effectively increase the volume of transition relative to fleet size and activity. HopSkipDrive notes that it does expect to have credits to utilize based on its previously submitted 2023 data and its current projections for 2024 and 2025 data.

Lessons Learned

In future plans, assessments of previous GHG plan actions and their impact on achieving stated policy goals will be provided.

The Commission will form an Implementation Working Group to provide feedback on CMS implementation and coordinate on implementation issues.⁴ HopSkipDrive respectfully recommends that the Commission include HopSkipDrive and other small TNCs in the Implementation Working Group to provide representation for considerations specific to small TNCs.

HopSkipDrive acknowledges that the CPUC will address enforcement of CMS annual targets in Phase II of the proceeding but that narrative elements of this Interim Plan will be scored, with deficiencies requiring resolution within 30 days.⁵ HopSkipDrive respectfully requests that the Commission keep in mind the limited historical data available, likely particularly to small TNCs,

⁴ *Id.* at 29-31.

⁵ *Id.* at 108.

to inform projections and as a result, included action plans when scoring narrative elements. Additionally, should the Commission determine deficiencies exist, HopSkipDrive respectfully requests that the Commission provide as much detail as possible about additional elements that need to be addressed by the relevant TNC.



California Public Utilities Commission



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