

December 18, 2025

CPUC Consumer Protection and Enforcement Division
Attention: Transportation Licensing and Analysis Branch
Via email to: CleanMiles@cpuc.ca.gov

SUBJECT: Reply of Center for Sustainable Energy® (CSE) to Protest and Responses of CSE Advice Letter 1: Proposed Drivers Assistance Program Implementation Plan and Handbook Pursuant to California Public Utilities Commission Decision 24-03-001

INTRODUCTION

Center for Sustainable Energy® (CSE), the Program Administrator (PA) of the Drivers Assistance Program (DAP), submits this Reply to the Protest submitted by Lyft on December 11, 2025, the Response submitted by Uber on December 11, 2025, and the Response submitted by HopSkipDrive on December 11, 2025, to Advice Letter (AL) 1, submitted by CSE on November 18, 2025.¹

CSE AL 1 included the proposed DAP Program Implementation Plan (PIP or Implementation Plan) and Program Handbook (Handbook), as required pursuant to Decision (D.)24-03-001.² The proposed Implementation Plan and Handbook outlined several elements of the Clean Miles Standard (CMS) program and the DAP, including proposed incentive levels, eligibility requirements, eligibility verification processes, and data exchange processes. In response to the submittal of AL 1, one party (Lyft) submitted a Protest and two parties (Uber and HopSkipDrive), submitted Responses, in summation:

- 1) Lyft protests the proposed Implementation Plan and Handbook due to the high value of the proposed incentives for new and used zero-emission vehicles (ZEVs). Lyft highlights that CSE's proposed incentive levels are a response to the elimination of state and federal incentives, including the federal clean vehicle credit and the California Driving Clean Assistance Program (DCAP). Lyft recommends CSE identify and evaluate alternative funding sources within the Implementation Plan. Additionally, Lyft opposes the proposed five-year eligibility window for drivers to claim the Ongoing Charging Incentive once a driver's income has been verified, instead recommending a one-year eligibility window. Similarly, Lyft opposes the proposal for drivers to access

¹ CSE AL 1, *Proposed Drivers Assistance Program Implementation Plan and Handbook Pursuant to California Public Utilities Commission Decision 24-03-001*, November 18, 2025.

² D.24-03-001, *Phase 1 Decision to Implement the Clean Miles Standard Program*, March 14, 2024.

DAP incentives once per calendar year or 12-month period, instead recommending drivers have access to DAP incentives once-per-lifetime.

- 2) In its separate Response, Uber expresses concern with the high incentive levels, highlights unanticipated barriers to the CMS targets, recommends updates to the methodology for calculating the Ongoing Charging Incentive, recommends clarification regarding the trip verification requirement for the Ongoing Charging Incentive, recommends the adoption of safeguards for the proposed ZEV retention requirement, and recommends the Implementation Plan and Handbook be updated to require drivers to provide consent for TNCs to disclose drivers' personal information.
- 3) In its separate Response, HopSkipDrive requests an updated definition for HopSkipDrive be included within the Implementation Plan and Handbook, recommends that smaller TNCs not be required to adhere to the same burdensome requirements established for larger TNCs, recommends flexibility to comply with the proposed manual data exchange proposal, requests clear data reporting templates, and requests clarity on the basis for the Drivers Working Group.

Pursuant to GO 96-B, General Rule 7.4.3, CSE provides responses to the Protest and Responses to CSE AL 1.

DISCUSSION

The proposed incentive levels outlined in CSE AL 1 were developed using the incentive calculation methodology developed by the Commission and are appropriate given recent market developments.

Lyft expresses concern with the high level of the proposed DAP incentives, stating, "The methodology outlined for the [DAP] Program in [D.24-03-001] set the initial incentive amounts at \$10,400 for a new ZEV and \$8,800 for a used ZEV. However, CSE's proposed Implementation Plan includes a significant increase in these upfront incentives payments, of \$21,400 for a new ZEV and \$15,300 for a used ZEV."³ Lyft contends that this increase in incentive levels is largely driven by the elimination of the federal clean vehicle tax credit and the depletion of funding for the California Driving Clean Assistance Program. Uber also highlights that the proposed incentives have roughly doubled due to the elimination of state and federal incentives. CSE clarifies that D.24-03-001 did not set incentive levels but established the incentive calculation methodology based on a cost gap analysis between a ZEV and an internal combustion engine (ICE) vehicle, as outlined in Attachment B of D.24-03-001. The incentive levels of \$10,400 for a new ZEV and \$8,800 for a used ZEV outlined in Attachment B of D.24-03-001 are not proposed incentive levels but rather initial estimates based on the Commission's methodology. D.24-03-001 directed the PA to use the Commission's methodology to establish the initial incentive levels and update the underlying assumptions, if needed. Lyft and Uber are correct that the high value of the proposed incentives is due primarily to the elimination of state and federal EV incentives. However,

³ Lyft Protest of CSE Advice Letter 1 (Lyft Protest), December 11, 2025, p. 1.

D.24-03-001 adopted the Commission's methodology with the goal of ensuring that DAP incentives offset the cost difference between a ZEV and an ICE vehicle. CSE contends that, based on this methodological goal and the subsequent elimination of state and EV federal incentives, the increased incentive levels proposed in the Implementation Plan are appropriate. CSE also suggests that it would be premature to update the Commission's methodology without data on program participation and impact, particularly since the Commission previously maintained this methodology in D.24-03-001 despite concerns expressed by parties. Additionally, Uber expresses concerns with the use of the IHS dataset used to inform CSE's updated assumptions, as detailed in Table 3 of the proposed Implementation Plan. Uber states that the IHS data does not reflect the purchasing decisions of high-mileage Transportation Network Company (TNC) drivers that may be eligible for DAP incentives. CSE contends that the use of IHS data is appropriate as a proxy for the intended incentive recipients, particularly because there is limited publicly-available data on the purchasing behavior of high-mileage TNC drivers.

Lyft states, "While the loss of these government programs is regrettable, Lyft strongly believes that California riders should not be solely responsible for covering the resulting shortfall".⁴ CSE clarifies that the proposed incentive levels do not require any additional funding contribution from TNC riders in California because CSE does not propose any increases in the CMS Regulatory Fee or the DAP budget to offset the elimination of state and federal EV incentives. Given the unchanged DAP budget, it is possible that the increased incentive levels could result in fewer incentives being available to drivers. Uber highlights this concern, stating that "...a lower, more widely available Upfront Purchase Incentive would have a larger impact on the CMS program and better assist TNCs in meeting the CMS targets."⁵ CSE recognizes Uber's concern; however, in Resolutions TL-19151, TL-19152, and TL-19153, the Commission established a minimum driving threshold (MDT) of 4,500 trips per 12-month, stating that "drivers who are providing more than 4,500 trips per year drive on average 8.5 hours per day over five days per week. Targeting these high-mileage, long-term drivers to transition early helps CMS Regulated Entities to meet their annual targets and can make a larger impact on reducing GHG emissions".⁶ CSE does not have the authority to revise this MDT and make the DAP incentive available to a wider pool of drivers, absent additional direction from the Commission. Moreover, CSE contends that a lower incentive level offered to a wider pool of drivers may not necessarily result in greater program impacts. For example, the Ride Clean Mass program, which is funded by the Massachusetts Clean Energy Center and implemented by CALSTART with assistance from CSE, offers lower incentive levels and has experienced low program participation. Specifically, Ride Clean Mass offers incentives of \$6,500 for new EVs and \$2,500 for used EVs and allows drivers to stack other state incentives to receive a

⁴ *Id.*

⁵ Uber Response to CSE Advice Letter 1 (Uber Response), December 11, 2025, p. 8.

⁶ California Public Utilities Commission, *Resolution TL-19151, Resolution Approving Lyft, Inc.'s Interim Greenhouse Gas Emissions Reduction Plan Submitted as Lyft Advice Letter 22*, March 13, 2025, p. 10; California Public Utilities Commission, *Resolution TL-19152, Resolution Approving Uber Technologies, Inc.'s Interim Greenhouse Gas Emissions Reduction Plan Submitted as Uber Advice Letter 27*, March 13, 2025, p. 8; California Public Utilities Commission, *Resolution TL-19153, Resolution Approving HopSkipDrive, Inc.'s Interim Greenhouse Gas Emissions Reduction Plan Submitted as HopSkipDrive Advice Letter 2*, March 13, 2025, p. 10.

total of up to \$10,000 or \$11,500 for income-qualified drivers (without the federal tax credits). Despite these low incentive levels (relative to DAP) and the absence of income limitations, incentive applications for the program have been far lower than anticipated. For these reasons, CSE maintains that the proposed approach of offering high incentives for a small group of high-mileage drivers is appropriate. CSE recommends the Commission approve this approach, at least until additional data on program participation and impact is available to inform future program design changes.

Lyft recommends CSE identify and evaluate alternative funding sources within the Implementation Plan. D.24-03-001 did not authorize the PA to undertake or fund such an analysis. Consequently, CSE is not able to respond to this request without direction from the Commission. Additionally, CSE highlights that D.24-03-001 directed the PA to propose updated incentive levels and assumptions through an annual Tier 2 Advice Letter. CSE suggests that this annual process may be suitable to identify and evaluate new sources of funding that may become available and to propose changes to incentive levels based on the availability of new funding.

Uber states the proposed value for the Ongoing Charging Incentive is higher than necessary due to flaws in the Commission's incentive calculation methodology. As discussed above, D.24-03-001 directed the PA to use the Commission's methodology. Accordingly, CSE is not able to adjust the methodology.

Uber states that the increased incentive levels, driven by the elimination of state and federal EV incentives, suggest evidence for unanticipated barriers that may impact TNCs' ability to meet the CMS targets. CSE recognizes this concern but contends that this issue is outside of the scope of CSE AL 1 and should instead be addressed in the Commission's forthcoming Phase 2 Decision in the Clean Miles Standard proceeding.

The incentive eligibility windows and incentive access limitations were developed to maximize program participation while limiting administrative burdens for drivers and the PA.

Lyft expresses concern with the proposal for a driver to be eligible to receive the Ongoing Charging Incentive for five consecutive years once a driver's income eligibility is verified upon application for the Upfront Purchase Incentive. Rather, Lyft recommends the Commission adopt a one-year eligibility period, stating that "CSE's proposed five-year period is untenable because the financial situations of TNC platform drivers can change rapidly, as they often start and stop driving at intermittent times for various reasons...Furthermore, an annual income verification aligns administratively with the existing annual verification requirement for the [MDT]."⁷ As discussed above, the Commission established a MDT of 4,500 trips per year to target high-mileage, long-term drivers who drive over 8.5 hours per day for most of the week. CSE contends that, unlike most TNC drivers, these high-mileage drivers are not likely to start and stop driving at intermittent times and are therefore not likely to have incomes that vary significantly from year to year. Additionally, CSE clarifies that an annual income verification

⁷ Lyft Protest at 2.

process does not align with the annual verification requirement for the MDT. Whereas MDT verification can be implemented relatively easily using mileage data provided by the TNCs, income verification requires the submission and evaluation of sensitive financial documents, which results in additional administrative burden for both drivers and the PA. Accordingly, CSE recommends the Commission reject Lyft's protest and recommendation and instead maintain the five-year window for the Ongoing Charging Incentive.

Lyft expresses concern with the proposal for drivers to be eligible for an Upfront Purchase Incentive once per calendar year or 12-month period. Instead, Lyft recommends drivers be limited to one incentive per lifetime. Lyft also acknowledges that the issue of allowing multiple access to incentives will be considered in the Commission's forthcoming Phase 2 Decision in the Clean Miles Standard proceeding. CSE acknowledges Lyft's concern. CSE adopted the once-per calendar year requirement in order to provide flexibility to drivers without preempting the Commission's determination on the multiple incentive access issue in the forthcoming Phase 2 Decision. CSE can update the incentive access limitation for drivers upon further direction from the Commission in the forthcoming Phase 2 Decision.

Uber expresses concern with CSE's language regarding trip verification for the Ongoing Charging Incentive, as outlined in the proposed Implementation Plan. Uber states that CSE's language "suggests drivers are eligible to receive an Ongoing Charging Incentive once they have completed a total of 4,500 trips and 12 months have passed since the last payment, which is different from the Phase 1 Decision's requirement that all of the 4,500 trips be completed within a 12-month span."⁸ CSE clarifies that drivers must complete 4,500 trips within a 12-month period in order to be eligible for the Ongoing Charging Incentive, as established in D.24-03-001. CSE's language was intended to clarify that drivers who meet this requirement may be eligible for the Ongoing Charging Incentive, even if more than 12 months have elapsed since the driver previously claimed this incentive. CSE can update the Implementation Plan to provide clarifying language, if determined to be necessary and if CSE is directed to do so by the Commission.

The requirement for drivers to disclose personal identifying information is appropriate and should be consistent across CMS Regulated Entities' Data Use Agreements.

Uber highlights that Personally Identifiable Information (PII) will be required for the MDT verification process. Uber recommends the proposed Implementation Plan and Handbook include requirements for drivers applying for DAP incentives to provide written consent for TNCs to disclose PII to CSE as a condition of receiving incentives. CSE is amenable to this recommendation and, if directed by the Commission, CSE can include this consent disclosure requirement within the forthcoming DAP Terms and Conditions. CSE appreciates Uber's proposal to require driver consent in the forthcoming Data Use Agreement documents that will be developed prior to DAP implementation. CSE recommends the Commission direct all participating TNCs to include similar language in their Data Use Agreements.

⁸ Uber Response at 13.

ZEV retention requirements are clearly outlined in the Implementation Plan and Handbook and do not require additional enforcement measures.

Uber highlights that CSE's proposed 36-month ZEV retention requirement would only be enforced when the incentive recipient applies for the Ongoing Charging Incentive in years following the vehicle acquisition. Uber recommends CSE establish a process to ensure all incentive recipients retain ZEVs for the full 36 months. CSE has already included the 36-month ZEV retention requirement within the Implementation Plan and Handbook, which specify that vehicle resale within the 36-month period is prohibited and would result in incentive repayment. CSE has discussed this issue with Commission staff, who did not offer additional enforcement mechanisms in addition to CSE's proposal. CSE can provide additional details on enforcement measures if directed to do so by the Commission.

The Implementation Plan and Handbook can be revised to clarify definitions for TNCs but not obligations for TNCs of different sizes.

HopSkipDrive states, "For purposes of implementing the [DAP] Program in the context of CARB regulations and Decision 24-03-011 [sic], what is relevant is that the requirements are applicable to the extent an entity is a TNC."⁹ For this reason, HopSkipDrive requests that the proposed Implementation Plan be revised to define HopSkipDrive as "A transportation network company registered with the California Public Utilities Commission."¹⁰ CSE is amenable to updating this definition within the Implementation Plan and Handbook. CSE clarifies that D.24-03-001 establishes an exemption for "Small CMS Regulated Entities, defined as CMS Regulated Entities with less than five million miles of [vehicle miles traveled (VMT)] in all periods of passenger service in a given calendar year..."¹¹ Therefore, the relevant factor is not whether an entity is a TNC but rather whether the entity is a TNC that exceeds five million miles of VMT in a calendar year. Indeed, there are several TNCs registered with the Commission that are exempted from the requirements established in D.24-03-001.¹² HopSkipDrive also states that "...small TNCs, like HopSkipDrive, should not be required to undertake the same obligations as the larger TNCs if doing so is more burdensome and costly for the small TNCs."¹³ CSE appreciates the unique situation of HopSkipDrive as a small TNC that is still considered a CMS Regulated Entity; however, with respect to the exemption discussed above, D.24-03-001 does not differentiate requirements based on the size of a CMS Regulated Entity. Accordingly, CSE does not have the authority to differentiate requirements without additional direction from the Commission. As outlined in the proposed Implementation Plan and Handbook, CSE respectfully requests that HopSkipDrive actively and faithfully engage in all marketing and survey distribution requirements, as established in D.24-03-001. Nevertheless, CSE will work with HopSkipDrive to reduce administrative burdens and simplify compliance with CMS requirements, where possible.

⁹ HopSkipDrive Response to CSE Advice Letter 1 (HopSkipDrive Response), December 11, 2025, p. 2.

¹⁰ *Id.*

¹¹ D.24-03-001 at 16.

¹² California Public Utilities Commission, Transportation Network Company Permits Issued. <https://www.cpuc.ca.gov/regulatory-services/licensing/transportation-licensing-and-analysis-branch/transportation-network-companies/tnc-permits-issued>

¹³ HopSkipDrive Response at 2.

The proposed data exchange processes were developed in conjunction with CMS Regulated Entities and will be implemented with coordination from CMS Regulated Entities.

HopSkipDrive highlights their concern with the 10-day window to provide data in accordance with CSE's proposed data exchange process and requests that CSE include the commitment to provide flexibility measures within the Implementation Plan, in addition to CSE AL 1. HopSkipDrive also requests CSE provide clear and straightforward data reporting templates at the outset. CSE highlights that the proposed data exchange process was developed in coordination with CMS Regulated Entities and designed to streamline drivers' timely receipt of incentives. CSE contends that extending the 10-day window for CMS Regulated Entities to provide data would put undue burden on drivers, who would be required to wait for more than a month to confirm their eligibility, and will unnecessarily delay the disbursement of incentives. Accordingly, CSE reiterates that a 10-day window is appropriate. Nevertheless, CSE is amenable to including the commitment to flexibility within the Implementation Plan and coordinating with HopSkipDrive to ensure timely adherence to the data exchange processes. As part of this coordination, CSE will develop clear data reporting templates that specify the trip count data that must be reported in order to verify that drivers have met the MDT. CSE intends to provide these templates well in advance of program launch.

The Drivers Working Group was established in D.24-03-001 as part of a suite of strategies to advance environmental justice goals.

HopSkipDrive states that the proposed Implementation Plan does not explain the basis for the Drivers Working Group to direct CMS Regulated Entities to comply with the CMS Environmental and Social Justice (ESJ) Action items. CSE highlights that the Drivers Working Group was established in D.24-03-001, Conclusion of Law 28(c), as part of several measures to ensure that CMS Regulated Entities advance CMS ESJ Action Items and document progress in doing so. CSE can clarify this language in the Implementation Plan if directed to do so by the Commission.

CONCLUSION

CSE submitted CSE AL 1, the Tier 3 Advice Letter to propose the DAP Implementation Plan and Handbook, in accordance with D.24-03-001. Accordingly, CSE respectfully requests that the Commission provide additional direction where needed and consistent with the recommendations and discussion herein and otherwise adopt CSE AL 1 as submitted.



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Service List R.21-11-014

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Implement Senate Bill 1014- the
California Clean Miles Standard
Program.

RULEMAKING 21-11-014
(Filed November 18, 2021)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this *Reply to Protest and Responses to CSE Advice Letter 1* on all known parties of record in this proceeding by delivering a copy via email to the current service list for R.21-11-014.

Executed on December 18, 2025, in San Diego, CA.



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