PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

VIA ELECTRONIC MAIL

November 17, 2026

Jimmy Purvis
Uber Technologies, Inc.
1725 3rd Street
San Francisco, CA 94158

SUBJECT: Disposition of Uber Advice Letter 44

Dear Jimmy Purvis:

Pursuant to Decision (D.) 24-03-001, the Consumer Protection and Enforcement Division (CPED) of the California Public Utilities Commission (CPUC) approves Uber Technologies, Inc.'s (Uber) Advice Letter (AL) 44. Uber's proposed contract with GPP Analytics Inc. to fulfill the role of Financial Auditor for the Clean Miles Standard (CMS) program is approved. A status certificate is attached for your records.

On September 22, 2026, Uber submitted Tier 2 AL 44 seeking CPUC approval of the contract between Uber, in its role as Contracting Agent, and GPP Analytics Inc. as the Financial Auditor for the CMS program. CPED did not receive any protests to AL 44.

Attachment 1 contains further discussion of Uber's request and CPED's disposition.

Please contact CPED CMS Program staff via email at CleanMiles@cpuc.ca.gov if you have any questions.

Sincerely,

Josh Huneycutt
Program Manager, Transportation Licensing & Analysis Branch

Advice Letter Status Certificate

Status of Advice Letter 0044 as of November 17, 2026

Uber Technologies, Inc. (PSG 38150)
Attention: Jimmy Purvis
1725 3rd Street
San Francisco, CA 94158

Advice Letter Subject:	**Uber AL 44, Uber Technologies, Inc.'s proposal requesting approval of the contract with GPP Analytics Inc. as the Financial Auditor for the Clean Miles Standard program.**
Division Assigned:	Consumer Protection and Enforcement
Date Filed:	09-22-2026
Disposition:	**Approved**
Effective Date:	**11-17-2026**

CPUC Contact Information:	CleanMiles@cpuc.ca.gov
TCP Contact Information:	Jimmy Purvis westregs@uber.com Monika Kothari mkothari@uber.com Judy Pau judypau@dwt.com

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Attachment 1: Staff Review and Disposition

Background

In Decision (D.) 24-03-001 (CMS Phase 1 Decision), CPUC established roles and responsibilities for implementation of the Clean Miles Standard (CMS) program, including a Financial Auditor and Uber's role as Contracting Agent. Working with CPED staff, Uber released a request for proposals for the Financial Auditor role on January 9, 2026, and received five proposals. CPED staff reviewed and evaluated the proposals.

On July 24, 2026, CPED staff provided Uber with the Financial Auditor selection. Uber subsequently prepared the proposed contract with GPP Analytics Inc. for CPUC review and approval.

Protests, Responses, and Replies

CPED did not receive any protests to AL 44.

Disposition of AL 44

On September 22, 2026, Uber submitted Tier 2 AL 44 requesting CPUC approval of the contract between Uber, in its role as Contracting Agent, and GPP Analytics Inc. as the Financial Auditor for the CMS program. Uber submitted the proposed contract as Confidential Attachment A and provided a declaration supporting confidential treatment in Attachment B.

D.24-03-001 provides the framework for selecting and contracting with the Financial Auditor:

(a) The Contracting Agent shall issue a request for proposals for a Financial Auditor within 12 months of the effective date of this decision;
(b) A Financial Auditor shall have experience conducting financial audits based on direction from the Commission;
(c) The Commission's staff shall select each Financial Auditor;
(d) The costs of the Financial Auditor shall be funded by the CMS Regulatory Fee and shall not exceed $1,000,000 for two or more audits;
(e) The Contracting Agent shall file a Tier 2 advice letter for approval of the contract with a Financial Auditor within 60 days after the Commission's staff select the Financial Auditor;
(f) The Contracting Agent shall enter into a contract with each Financial Auditor selected by the Commission's staff;
(g) The Commission's staff shall approve the key deliverables of each Financial Auditor, including the scope of work, the financial audit plan, the reporting metrics, and the financial audit report;
(h) Each financial audit report shall, at minimum, address the questions in Attachment C of this decision;

(i) The first financial audit report shall be due within two years of the approval of the first Drivers Assistance Program Implementation Plan and Handbook;
(j) The Contracting Agent shall issue a request for proposals for a Financial Auditor for the second financial audit report within one year after the completion of the first financial audit report;
(k) If the first or second financial audit report recommends an additional audit, the Commission's staff may direct the Contracting Agent to issue a request for proposals for another financial audit; and
(l) Each CMS Regulated Entity shall provide all information and documentation requested by the Financial Auditor within 10 business days of each request.

CPED staff reviewed the proposed contract and supporting materials for consistency with the CMS Phase 1 Decision and found that the contract comports with the allowable budget and scope of work of the financial auditor.

CPED finds that Uber has complied with the applicable requirements of the CMS Phase 1 Decision. The proposed contract with GPP Analytics Inc. is complete and reasonable for the work required of the Financial Auditor. Therefore, CPED approves Uber's proposed contract with GPP Analytics Inc. as the Financial Auditor for the CMS program, effective today.