

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Establish
Polices, Processes, and Rules Regarding
Autonomous Vehicle Passenger Transportation
Service

R.25-08-013
(Filed August 28, 2025)

**OPENING COMMENTS OF THE SAN FRANCISCO MUNICIPAL TRANSPORTATION
AGENCY IN RESPONSE TO THE E-MAIL RULING PROVIDING PREHEARING
CONFERENCE QUESTIONS FOR PARTIES**

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Dated: January 30, 2026

The San Francisco Municipal Transportation Agency (“SFMTA”) submits these written opening comments to the E-Mail Ruling Providing Prehearing Conference Questions for Parties sent by Administrative Law Judge Robert M. Mason III on January 6, 2026 as part of rulemaking R.25-08-013 to Establish Policies, Processes and Rules Regarding Autonomous Vehicle Passenger Transportation Service.

DISCUSSION

Safety and Reliability Concerns

San Francisco is still analyzing the blackouts on December 20, 2025 and subsequent days to identify lessons learned for many City departments, including emergency responder agencies, as well as for private parties. This analysis will include evaluation of the impacts of autonomous vehicle performance failures. The City would be pleased to update the California Public Utilities Commission once this evaluation is complete; however, San Francisco is not yet prepared to draw final conclusions at this time.

Purpose-Built AVs

We recommend that the Commission broaden the scope of its inquiries regarding purpose-built autonomous vehicles to consider the impacts of incidents and collisions involving these vehicles on stranded or injured passengers, the roadway, emergency services, and other essential public services. San Francisco emergency responders have moved many stalled autonomous vehicles utilizing the in-vehicle human controls from locations where they create acute hazards and/or interfere with public services. Vehicles that cannot be moved by police or fire fighters without towing have the potential to have much greater impacts on the transportation network, on life safety, and on other public services. These impacts may be especially acute during a large-scale performance failures, such as the one that occurred during the December blackout, or in the event of a natural disaster that has more profound effects on the road network, such as an earthquake or very severe weather event. California regulators should consider expectations for emergency and disaster preparedness for fleets of vehicles with no

human controls especially in relation to the scale of a fleet and the operator's resources to address a fleet-wide failure.

Dated: January 30, 2026

Respectfully submitted,

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On behalf of: THE SAN FRANCISCO MUNICIPAL
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