COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

June 16, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. Lyft, Inc.
Docket No.

Dear Secretary Chiavetta:

Enclosed for filing please find an original of the Petition of the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement for Interim Emergency Relief.

Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

Prosecutor for the Bureau of
Investigation and Enforcement

Enclosures

cc: Chief Administrative Law Judge Charles E. Rainey, Jr.
As per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Petitioner	:	
	:	Docket No. _____
v.	:	
	:	
Lyft, Inc.	:	
Respondent	:	

To: Lyft, Inc.

You are hereby notified that you may file an Answer to the attached Petition for Interim Emergency Relief within five (5) days from the date of service of this notice. Your Answer must conform to the requirements set forth in 52 Pa. Code § 5.61 (relating to answers to complaints, petitions and motions).

All pleadings, such as Answers to Petitions, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Additionally, you must serve a copy on the undersigned prosecutors for the Bureau of Investigation and Enforcement.

Stephanie M. Wimer
Prosecutor
PA Attorney I.D. 207522

Michael L. Swindler
Prosecutor
PA Attorney I.D. 43319

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-5000

DATE: June 16, 2014

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION, BUREAU OF INVESTIGATION AND ENFORCEMENT, Petitioner	:	
v.	:	Docket No. _____
LYFT, INC., Respondent	:	

PETITION OF THE BUREAU OF INVESTIGATION AND ENFORCEMENT OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION FOR AN INTERIM EMERGENCY ORDER

AND NOW, comes the Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission ("Commission" or "PUC"), pursuant to 52 Pa. Code § 3.6, and petitions the Commission for an Interim Emergency Order requiring Lyft, Inc. ("Lyft") to immediately cease and desist from brokering transportation service for compensation between points within the Commonwealth of Pennsylvania. In support thereof, I&E avers as follows:

INTRODUCTION

1. On June 5, 2014, I&E filed a Formal Complaint ("Complaint") against Lyft alleging, *inter alia*, that Lyft acts as a broker of transportation for compensation between points within the Commonwealth through its internet and mobile application software ("the Lyft app"), which connects passengers to individuals who have registered with Lyft

as independent ride-sharing operators ("Lyft driver").[1] Lyft drivers do not possess Certificates of Public Convenience issued by the Commission authorizing them to provide motor carrier passenger service. As set forth in the Complaint, on or around February 17, 2014, Lyft launched a ride-sharing passenger transportation service in Pittsburgh. Lyft continues to provide this service despite the filing of I&E's Complaint on June 5, 2014, other enforcement actions taken by I&E, and the fact that the Commission has not granted Lyft brokerage or other operating authority. Accordingly, I&E is compelled to bring this Petition for Interim Emergency Relief to seek an Order from the Commission directing Lyft to immediately cease and desist from operating its ride-sharing passenger transportation service until it receives the requisite authority to do so.[2] The averments of I&E's Complaint are incorporated herein as if fully set forth.

PARTIES

2. The Pennsylvania Public Utility Commission, with a mailing address of P.O. Box 3265, Harrisburg, PA 17105-3265, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq*.

3. Petitioner is the Commission's Bureau of Investigation and Enforcement and is

---

[1] The Complaint is docketed with the Commission at C-2014-2422713.

[2] On April 3, 2014, Lyft filed an Application for Motor Common Carrier of Persons in Experimental Service for the Commonwealth of Pennsylvania. *Lyft Inc.'s Application for Motor Common Carrier of Persons in Experimental Service for the Commonwealth of Pennsylvania*, Docket No. A-2014-2415045 (hereinafter referred to as "Lyft's Application"). Several protests were filed to Lyft's Application and it is currently pending before the Commission.

the entity established to initiate proceedings that are prosecutory in nature for violations of the Public Utility Code and Commission regulations. *See Delegation of Prosecutory Authority to Bureaus with Enforcement Responsibilities*, Docket No. M-00940593 (Order entered September 2, 1994), as amended by Act 129 of 2008, 66 Pa.C.S. § 308.2(a)(11).

4. Respondent is Lyft, Inc., with a principal place of business at 548 Market Street #68514 San Francisco, CA 94104. Lyft uses a digital platform, the Lyft app, to connect passengers to Lyft drivers who use their personal, non-commercially licensed or insured vehicles for the purposes of providing transportation services to the public for compensation.

JURISDICTION

5. The Commission has jurisdiction over this matter pursuant to 66 Pa.C.S. § 501, which provides in pertinent part: "In addition to any powers expressly enumerated in this part, the commission shall have full power and authority, **and it shall be its duty to enforce,** execute and carry out, by its regulations, orders, or otherwise, **all and singular, the provisions of this part, and the full intent thereof** . . ." (emphasis added).

STANDARD FOR INTERIM EMERGENCY RELIEF

6. Section 3.6(a) of the Commission's regulations, 52 Pa. Code § 3.6(a), permits a party to petition the Commission for an interim emergency order during the course of a proceeding. The petition must establish facts to demonstrate that:

1. The Petitioner's right to relief is clear.
2. The need for relief is immediate.
3. The injury would be irreparable if relief is not granted.

4. The relief is not injurious to the public interest.

52 Pa. Code § 3.6(b).

7. It is not necessary to determine the merits of an underlying complaint, controversy or dispute in order to find that a petitioner has satisfied the first prong of Section 3.6(b) of the Commission's regulations, 52 Pa. Code 3.6(b). Rather, the Commission has found that if a petitioner raises "substantial legal questions," then a petitioner has established that its right to relief is clear. *Core Communications, Inc. v. Verizon Pennsylvania, Inc. and Verizon North LLC*, Docket No. P-2011-2253650 (Order entered September 23, 2011); *Level 3 Communications, LLC v. Marianna & Scenery Hill Telephone Company*, Docket No. C-20028114 (Order entered August 8, 2002); *T.W. Phillips Gas and Oil Company v. The Peoples Natural Gas Company*, 492 A.2d 776 (Pa. Cmwlth. 1985).

8. "Emergency" is defined in the Commission's regulations as "[a] situation which **presents a clear and present danger to life or property** or which is uncontested and requires action prior to the next scheduled meeting." 52 Pa. Code § 3.1 (emphasis added).

9. The party seeking emergency relief bears the burden of proving that the facts and circumstances meet all four of the above requirements. 66 Pa.C.S. § 332; 52 Pa. Code § 3.6(b). The burden of proof must be carried by a preponderance of the evidence. *Samuel J. Lansberry, Inc. v. Pa. PUC,* 578 A.2d 600 (Pa. Cmwlth. 1990). The petitioner's evidence must be more convincing, by even the smallest amount, than that presented by the other party. *Se-Ling Hosiery v. Margulies,* 70 A.2d 854 (1950).

10. If the foregoing criteria are met, a presiding officer may issue an order granting the relief sought, which order shall become effective immediately upon issuance by the presiding officer. 52 Pa. Code § 3.10.

A. I&E's Right To Relief Is Clear

11. I&E serves as the Commission's prosecutory bureau and enforces compliance with state and federal motor carrier safety laws and regulations. *Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011), p. 5.

12. Section 2505 of the Public Utility Code prohibits persons or corporations from engaging "in the business of a broker in this Commonwealth unless such person holds a brokerage license issued by the Commission." 66 Pa.C.S. § 2505(a).

13. A "broker" is defined as:

> Any person or corporation not included in the term "motor carrier" and not a bona fide employee or agent of any such carrier, or group of such carriers, who or which, as principal or agent, sells or offers for sale any transportation by a motor carrier, or the furnishing, providing, or procuring of facilities therefor, or negotiates for, or holds out by solicitation, advertisement, or otherwise, as one who sells, provides, furnishes, contracts, or arranges for such transportation, or the furnishing, providing or procuring of facilities therefor, other than as a motor carrier directly or jointly, or by arrangement with another motor carrier, and who does not assume custody as a carrier.

66 Pa.C.S. § 2501(b).

14. Brokers are prohibited from utilizing a "motor carrier who or which is not the lawful holder of an effective certificate of public convenience or permit." 66 Pa.C.S.

§ 2505(a).

15. Lyft procures transportation service for passengers who request a ride using the Lyft app. The Lyft app locates the nearest available Lyft driver, and then alerts the Lyft driver of the passenger's ride request. Because Lyft arranges transportation service for third-party passengers, it is a broker. Lyft does not possess a brokerage license issued by the Commission, which violates Section 2505(a) of the Public Utility Code, 66 Pa.C.S. § 2505(a).

16. Lyft engages non-professional drivers using their personal vehicles for commercial transportation. Lyft drivers are not certificated motor carriers, which violates Section 2505(a) of the Public Utility Code, 66 Pa.C.S. § 2505(a).

17. As recently as June 10, 2014, Lyft advised media outlets that it would continue to operate in Pittsburgh despite I&E's repeated efforts, which are explained in greater detail below, to enforce compliance with the Public Utility Code and Commission regulations. *See* http://triblive.com/news/allegheny/6260482-74/puc-uber-drivers#axzz34QiG9COc. A copy of this article is attached as Exhibit 1.

18. A straightforward reading of Section 2505(a) of the Public Utility Code leads to the inescapable conclusion that Lyft has and will continue to egregiously violate the Public Utility Code during the pendency of I&E's enforcement proceedings.

B. The Need For Relief Is Immediate

19. I&E's need for relief is immediate and on-going. I&E has attempted on numerous occasions to stop Lyft from unlawfully brokering transportation service using non-

certificated drivers – all to no avail. On April 22, 2014, an I&E motor carrier enforcement officer filed non-traffic citations before Magisterial District Judge Eugene Ricciardi against twelve (12) Lyft drivers for operating a motor carrier without possessing a certificate of public convenience, pursuant to 66 Pa.C.S. § 3310.[3] In response to the citations, on April 26, 2014, Lyft advised the media that it stands by its drivers, and would pay for any related fines or legal costs. *See* http://www.post-gazette.com/business/2014/04/26/PUC-cracks-down-on-Lyft-Uber-drivers/stories/201404250181. A copy of this article is attached as Exhibit 2.

20. Lyft did not cease brokering transportation in Pittsburgh after the non-traffic citations were filed.

21. Then, on June 5, 2014, I&E filed complaints before the Commission against the same twelve (12) Lyft drivers for transporting passengers for compensation between points in Pennsylvania while not holding certificates of public convenience, in violation of 66 Pa.C.S. § 1101. I&E proposed that a $1,000 civil penalty per Lyft driver be imposed and that the Pennsylvania Department of Transportation (PennDOT) suspend the vehicle registration of each Lyft driver, pursuant to 75 Pa.C.S. § 1375.[4]

---

[3] These proceedings are docketed as follows: MJ-05227-NT-0000291-2014, MJ-05227-NT-0000305-2014, MJ-05227-NT-0000289-2014, MJ-05227-NT-0000294-2014, MJ-05227-NT-0000309-2014, MJ-05227-NT-0000287-2014, MJ-05227-NT-0000308-2014, MJ-05227-NT-0000315-2014, MJ-05227-NT-0000306-2014, MJ-05227-NT-0000313-2014, MJ-05227-NT-0000298-2014 and MJ-05227-NT-0000296-2014.

[4] These proceedings are docketed at the Commission as follows: C-2014-2418173, C-2014-2418174, C-2014-2418175, C-2014-2418176, C-2014-2418177, C-2014-2418178, C-2014-2418179, C-2014-2418180, C-2014-2418281, C-2014-2418282, C-2014-2418283 and C-2014-2418284.

22. Also on June 5, 2014, I&E filed a complaint against Lyft for offering to broker and brokering transportation without authority to do so. I&E's complaint requested a $130,000 civil penalty.

23. After the filing of I&E's numerous complaints before the Commission on June 5, 2014, Lyft brazenly continued, and presently continues, to broker transportation using uncertificated motor carriers. *See* Exhibit 1, which is attached.

24. As explained in greater detail below, Lyft's unlicensed operation poses substantial threats to public safety and should not be permitted to continue during the pendency of I&E's complaint proceedings.

C. The Injury From Lyft's Actions Will Be Irreparable If Relief Is Not Granted

25. By brokering transportation without a license and using non-certificated drivers to transport passengers, Lyft is violating Section 2505(a) of the Public Utility Code, 66 Pa.C.S. § 2505(a). A violation of law constitutes irreparable harm *per se*. *Pa. PUC v. Israel*, 52 A.2d 347 (1947). When certain conduct is declared to be unlawful, it is tantamount in law to being injurious to the public; continuing such unlawful conduct constitutes irreparable injury. *Id.*

26. Additionally, the Commission has stated that "in regulating motor carrier passenger transportation service, the Commission has a fundamental duty to ensure driver integrity and vehicle safety for the service provided by each carrier." *Application of Yellow Cab Company of Pittsburgh, Inc. t/a Yellow X, for the additional right to begin*

transport, by motor vehicle, persons in the experimental service of Transportation Network Service for passenger trips originating or terminating within Allegheny County, Pennsylvania, Docket No. C-2014-2410269 (May 22, 2014), p. 7. For the reasons explained below, in continuing to broker transportation without a license and by using uncertificated drivers to transport the public, Lyft has unilaterally deprived the Commission of its obligation to ensure driver integrity, vehicle safety and the maintenance of sufficient insurance coverage.

27. Since Lyft drivers are not certificated motor carriers, the Commission cannot be certain that its regulations pertaining to driver safety, 52 Pa. Code §§ 29.501-08, are being met. These requirements provide, *inter alia*, that Lyft obtains driver history and criminal records, and that drivers hold a current, valid license, are at least 21 years of age and do not use alcohol or controlled substances while operating a vehicle in passenger service.

28. Likewise, the Commission cannot be sure that the vehicles of Lyft drivers comply with its vehicle safety requirements at 52 Pa. Code 29.401-407, which include equipment standards, and compliance with PennDOT vehicle inspection and Commission inspection requirements.

29. Significantly, Lyft drivers are not providing any evidence of insurance to the Commission, as motor carriers are required to do pursuant to 52 Pa. Code § 32.2. Further, the Commission demands that minimum levels of insurance be maintained, as set forth in 52 Pa. Code § 32.11.

30. Important questions pertaining to insurance coverage were raised in Lyft's

Application proceeding. Because Lyft facilitates commercial transportation by retaining drivers who use their personal vehicles, it is likely that the insurance policies of Lyft drivers exclude coverage for accidents or injuries that occur while the vehicle is being used for commercial purposes. *See Protest of Concord Limousine, Inc. in Re: Application of Rasier-PA, LLC* and *Protest of The Insurance Federation of Pennsylvania, Inc. to Rasier's Application*, Docket No. A-2014-2415045. It is also questionable whether Lyft's excess insurance covers the operation of personal vehicles owned by its drivers. *Id.* If a fatal or injurious motor vehicle accident occurs today, the results would be catastrophic, especially if the Lyft driver's insurance policy excludes commercial coverage.

31. Until these important questions are resolved and Lyft, as well as Lyft drivers, become licensed or certified entities that abide by the Commission's important safety regulations, the Commission should demand that Lyft cease from operating its ride-sharing network. To do otherwise renders the Commission's laws and regulations in this area useless. If Lyft is permitted to operate in this manner, who won't be?

D. The Relief Requested Is Not Injurious To The Public Interest

32. The relief that I&E requests is certainly not injurious to the public interest. To the contrary, Lyft has no lawful right to broker transportation for compensation between points within the Commonwealth. Until Lyft becomes licensed and its drivers are certificated, the Commission is unable to guarantee that Lyft is brokering transportation using drivers who adhere to the Commission's safety and insurance regulations – all of

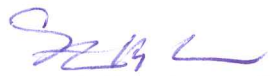
which were designed to safeguard the public. Lyft's "word" that it provides safe service is not an excuse to flagrantly ignore and break the law.

PRAYER FOR RELIEF

WHEREFORE, the Bureau of Investigation and Enforcement, Petitioner, respectfully requests that the Commission enter an Order that directs Lyft, Inc. to immediately cease and desist from utilizing its digital platform to facilitate transportation for compensation to passengers using non-certificated drivers in their personal vehicles.

In accordance with 52 Pa. Code § 3.6(a), I&E requests that the Commission schedule a hearing on this matter before an Administrative Law Judge no later than **June 26, 2014**.

Respectfully submitted,



Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

Michael L. Swindler
Prosecutor
PA Attorney ID No. 43319

Wayne T. Scott
First Deputy Chief Prosecutor
PA Attorney ID No. 29133

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-5000

DATE: June 16, 2014

VERIFICATION

I, David W. Loucks, Chief Motor Carrier Division of the Bureau of Investigation and Enforcement, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect that the Bureau will be able to prove same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Date: June 16, 2014

David W. Loucks, Chief
Motor Carrier Enforcement Division
Bureau of Investigation and Enforcement

EXHIBIT 1

TRIBLIVE

Lyft, Uber not going anywhere despite fines

By Bobby Kerlik
Staff Reporter, 412-320-7886

Published: Tuesday, June 10, 2014, 11:15 p.m.
Updated 3 hours ago

Ride-share companies Lyft and Uber said on Tuesday they would continue to operate in Pittsburgh despite big fines sought by the Pennsylvania Public Utility Commission, setting up a legal showdown with the state agency.

The PUC filed legal paperwork last week proposing fining Lyft $130,000 and Uber $95,000 for what the agency calls illegal operations since they started in February and March, respectively. The PUC fined 23 previously cited drivers $1,000 each. The commissioners would have to approve the fines before they are imposed.

The PUC asked PennDOT to revoke the registrations of the drivers who were cited.

Both Lyft and Uber spokespeople said their companies would cover the cost of PUC driver citations — including the $1,000 fines — and would continue to offer rides to passengers in the area. The companies and drivers have 20 days to respond.

"We ... commit to standing strong with drivers and passengers every step of the way, fighting any citations, covering relevant costs and making policy progress," Lyft spokeswoman Paige Thelan said.

Uber spokesman Taylor Bennett said traditional taxi companies are holding up state approval of ride sharing.

"The PUC's recent enforcement action taken against drivers utilizing Uber's platform is disappointing. We have been working in good faith with the PUC to create a regulatory framework that allows for modern business models like ride sharing," Bennett said. "Efforts to penalize drivers directly impact their ability to expand economic opportunities, create new jobs and contribute to the economy."

Cited Lyft and Uber drivers could not be reached or declined to comment. The drivers were cited initially in April when a PUC compliance officer took a variety of rides from between March 31 and April 21, including pickups at the Wyndham Grand, Rivers Casino and Station Square. The citations were summary offenses filed with a magistrate with hearings set in September. The new fines would be civil penalties, PUC spokeswoman Jennifer Kocher said.

Both Lyft and Uber have applications pending with the PUC seeking approval. Several taxi companies from across the state have filed protests against the applications, records show. A date has not been set for a hearing.

"It's unfortunate that this is the approach we have to take in order to ensure the safety of the entire community," Kocher said. "We have been telling (the companies) what is required to operate within the bounds of the law, but they chose to open and begin business, leaving us no choice but to enforce the law."

Among the groups who opposed Lyft and Uber applications is the Insurance Federation of Pennsylvania, an industry group. Samuel Marshall, president and CEO, said most individual drivers have policies that exempt coverage if the policyholder is using the vehicle as a taxi. He said Lyft and Uber should make their insurance the primary coverage for drivers.

"It exposes our members to unanticipated, unaccepted and uncompensated liability expenses," Marshall said. "That's an expense all of our policy holders will have to pay for."

Bobby Kerlik is a staff writer for Trib Total Media. He can be reached at 412-320-7886 or bkerlik@tribweb.com.

EXHIBIT 2

Pittsburgh Post-Gazette
post-gazette.com

Pennsylvania PUC cracks down on Lyft, Uber drivers

April 25, 2014 11:50 PM
By Kim Lyons / Pittsburgh Post-Gazette

The battle for Pittsburgh's passengers has heated up, with the Public Utility Commission issuing its first citations since two ride-share companies moved into the area earlier this year.

Court records show PUC enforcement officer Charles Bowser cited 23 drivers of ride-share companies Lyft and Uber between March 31 and April 21. Each driver is cited for operating a passenger carrier without a certificate of public convenience. The citations, issued through the office of District Justice Gene Ricciardi, were all dated April 22, and are being mailed to drivers.

According to court records, the trips cited by Mr. Bowser included four to 777 Casino Drive, which is the Rivers Casino; three trips to 300 West Station Square Drive, which is the Sheraton Station Square hotel; and six trips to 600 Commonwealth Place, which is the Wyndham Grand hotel.

PUC spokeswoman Jennifer Kocher said the enforcement officer's actions — taking rides, then citing the drivers — were not atypical for enforcement procedures.

None of the cited drivers contacted by the Post-Gazette returned calls seeking comment Friday.

The PUC issued a press release Friday reminding drivers that it is "unlawful to transport any passenger for compensation without holding a PUC Certificate of Public Convenience. Compensation can include 'suggested donations.' "

Lyft and Uber, two San Francisco-based companies, have enlisted drivers in Pittsburgh to use their personal vehicles to offer taxilike services that connect drivers and riders via smartphone apps. The companies have been compared to illegal jitneys by opponents, which includes Yellow Cab Co., the area's largest taxi company.

Lyft has said since its drivers are not paid, but rather receive suggested donations from passengers, it was not subject to the PUC regulations for passenger transportation companies.

On Friday, Lyft spokeswoman Paige Thelen said the company was aware of the citations and would stand behind any cited drivers, including paying any fines or related legal costs. She did not know how many of the 23 drivers cited worked for Lyft. "We've been in close contact with our drivers to let them know we are here for them," she said.

Matthew Gore, general manager of Uber Pittsburgh, said the company had no information about which or how many drivers may have been ticketed.

"That said, if one of our partners were to receive a ticket because the PUC wants to protect entrenched interests, we absolutely stand by them and that includes reimbursing them for any fines or court fees," he said. "In over 100 cities around the world, Uber is delivering safe, reliable and affordable transportation options that consumers and drivers have come to love. At times, it takes the public voice to get officials to act in the best interests of their citizens and not special interests — it's the people calling for action, not Uber."

Yellow Cab president Jamie Campolongo said Friday he felt sorry for the cited drivers. "It's not the people that are driving that are the problem, it's Lyft and Uber. Just like when people complain about the cab companies, it's not the cab drivers' problem, it's my problem."

Lyft and Uber both have applications before the state of Pennsylvania to obtain certificates of public convenience to operate their services in Pittsburgh, as does Yellow Cab, which is seeking to launch its own version of a ride share, called Yellow X. The earliest the PUC would rule on the matter is its next public hearing May 22.

Kim Lyons: klyons@post-gazette.com or 412-263-1241. Twitter: @SocialKimly.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Complaint upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Notification by First Class Mail:

Lyft, Inc.
548 Market Street #68514
San Francisco, CA 94104

_____
Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265

DATE: June 16, 2014