



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
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May 8, 2024

VIA EMAIL ONLY

EDTariffUnit@cpuc.ca.gov

**Advice Letter 240-E
(U 933-E)**

California Public Utilities Commission
Energy Division, Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

Subject: Liberty Utilities (CalPeco Electric) LLC (U-933 E) –Rule 14 Tariff Change

Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty”) submits this **Tier 2** Advice Letter to align with current business practices. This advice letter requests authority to update Liberty’s Rule 14 tariff to provide clarifications regarding Liberty’s ability to de-energize service when a hazardous situation on a customer-owned system is identified.

Background

Liberty’s proposed revision to Rule 14 includes a clarification for Liberty’s authorized actions when a hazardous situation is identified on a customer-owned system. The revision will allow Liberty to suspend delivery of electricity until such time as Liberty determines that the hazardous situation has been rectified or repaired by the customer.

This advice letter requests authority to revise its Rule 14 tariff to include the following language:

Temporary Suspension for Customer Repairs. When a hazard is identified by the Utility, and such hazard is directly related to Customer-owned systems, the Utility has the right to suspend the delivery of electricity until such time as the Utility determines the hazard has been rectified or repaired by the Customer. When situationally practical, a notice will be provided to the customer prior to de-energization. In emergency situations, notification will be provided to the Customer after the service is de-energized. When the Utility determines that the hazard has been rectified to its satisfaction and it is safe to re-energize, the Utility will re-energize the service at the earliest convenience of both the Utility and Customer.

Effective Date

Liberty requests that this **Tier 2** advice letter be effective as of June 7, 2024.

Protests

Anyone wishing to protest this advice letter may do so by letter sent via U.S. mail, facsimile, or email, any of which must be received no later than May 28, 2024, which is 20 days after the date

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California Public Utilities Commission
May 8, 2024
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of this advice letter. There are no restrictions on who may submit a protest, but the protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. Protests should be mailed to:

California Public Utilities Commission
Energy Division, Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298
Facsimile: (415) 703-2200
Email: edtariffunit@cpuc.ca.gov

The protest should also be sent via email and U.S. Mail to Liberty Utilities (CalPeco Electric) LLC at the address shown below on the same date it is mailed or delivered to the Commission:

Liberty Utilities (CalPeco Electric) LLC
Attn: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Email: CaseAdmin@libertyutilities.com

Notice

In accordance with General Order 96-B, Section 4.3, a copy of this Advice Letter is being sent electronically to parties shown on the attached service lists. Address change requests to Liberty's GO 96-B service list should be directed by electronic mail to:
AnnMarie.Sanchez@LibertyUtilities.com.

For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at ProcessOffice@cpuc.ca.gov.

If additional information is required, please do not hesitate to contact me at
Dan.Marsh@libertyutilities.com.

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/ Dan Marsh

Dan Marsh
Senior Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List

Rule No. 14

CONTINUITY OF SERVICE

- A. Shortage and Interruption. The Utility will exercise reasonable diligence to furnish a continuous and sufficient supply of electricity to its Customers and to avoid any shortage or interruption of delivery thereof. It cannot, however, guarantee a continuous or sufficient supply or freedom from interruption.

The Utility will not be liable for interruption or shortage of supply, nor for any loss or damage occasioned thereby, if such interruption or shortage results from any cause not within its control.

Whenever, in the operation of the Utility’s electric plants, properties, and/or systems, interruption in the delivery of electric energy to Customers results from or is occasioned by causes other than the exercise by the Utility of its right to suspend temporarily the delivery of electric energy for the purpose of making repairs or improvements to its system, notice of any such interruption will not be given to the Customers of the Utility, but the Utility shall exercise reasonable diligence to reinstitute delivery of electric energy.

- B. Temporary Suspension for Repairs. The Utility, whenever it shall find it necessary for the purpose of making repairs or improvements to its system, will have the right to suspend temporarily the delivery of electricity. In all such cases as reasonable notice thereof as circumstances will permit will be given to the Customer, and the making of such repairs or improvements will be prosecuted as rapidly as may be practicable and, if practicable, at such times as will cause the least inconvenience to the Customers.

- C. Temporary Suspension for Customer Repairs. When a hazard is identified by the Utility, and such hazard is directly related to Customer-owned systems, the Utility has the right to suspend the delivery of electricity until such time as the Utility determines the hazard has been rectified or repaired by the Customer. When situationally practical, a notice will be provided to the customer prior to de-energization. In emergency situations, notification will be provided to the Customer after the service is de-energized. When the Utility determines that the hazard has been rectified to its satisfaction and it is safe to re-energize, the Utility will re-energize the service at the earliest convenience of both the Utility and Customer.

(N)
|
(N)

- D. Apportionment of Supply During Time of Shortage. Should a shortage of supply ever occur, the Utility will apportion its available supply of electricity among its Customers as authorized or directed by the Public Utilities Commission. In the absence of a Commission order, the Utility will apportion the supply in the manner that appears to it not equitable under conditions then prevailing.

Advice Letter No. 240-E

Issued by
Edward N. Jackson
Name

Date Filed May 8, 2024

Decision No. _____

President
Title

Effective June 7, 2024

Resolution No. _____

VIA EMAIL

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ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Liberty Utilities (CalPeco Electric) LLC (U-933-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Dan Marsh

Phone #: 530-721-2435

E-mail: Dan.Marsh@libertyutilities.com

E-mail Disposition Notice to: AnnMarie.Sanchez@libertyutilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 240-E

Tier Designation: 2

Subject of AL: Rule 14 Tariff Change

Keywords (choose from CPUC listing): Rules

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 6/7/24

No. of tariff sheets: 1

Estimated system annual revenue effect (%): n/a

Estimated system average rate effect (%): n/a

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Rule No. 14

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Dan Marsh
Title: Senior Manager, Rates and Regulatory Affairs
Utility Name: Liberty Utilities (CalPeco Electric) LLC
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 530-721-2435
Facsimile (xxx) xxx-xxxx:
Email: Dan.Marsh@libertyutilities.com

Name: AnnMarie Sanchez
Title: Coordinator
Utility Name: Liberty Utilities (California)
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 562-805-2052
Facsimile (xxx) xxx-xxxx:
Email: AnnMarie.Sanchez@libertyutilities.com

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	