

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Company name/CPUC Utility No. California Pacific Electric Company, LLC/U 933-E

Utility type:

☒ ELC

☐ GAS

☐ PLC

☐ HEAT

☐ WATER

Contact Person: Bob Dodds

Phone #: 530-543-5299

E-mail: bob.dodds@liberty-energy.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 4-E

Subject of AL: Notice of Intent to Change the Method of Calculating System Reliability Indices
from the Method Specified in CPUC Decision 96-09-045

Keywords (choose from CPUC listing): _____

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other

If AL filed 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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Resolution Required? ☒ Yes ☐ No

Tier Designation: ☐ 1 ☒ 2 ☐ 3

Requested effective date: April 25, 2011

No. of tariff sheets: 0

Estimated system annual revenue effect (%): _____

Estimated system average rate effect (%): _____

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:

Service affected and changes proposed¹: Adopts IEEE Standard 1366 with regard to major event days

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

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

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

jinj@cpuc.ca.gov and mas@cpuc.ca.gov

Utility Info (including e-mail)

California Pacific Electric Company, LLC

Attention: Advice Letter Protests

933 Eloise Avenue

South Lake Tahoe, CA 96150

Email: Bob.dodds@liberty-energy.com

¹ Discuss in AL if more space is needed.



California Pacific Electric Company, LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 905-465-4514

VIA EMAIL AND HAND-DELIVERY

March 25, 2011

**Advice Letter 4-E
(U 933-E)**

Public Utilities Commission of the State of California
Attn: Energy Division, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102-3298

Subject: Notice of Intent to Change the Method of Calculating System Reliability Indices
from the Method Specified in CPUC Decision 96-09-045

In response to Mr. Paul Clannon's letter to Mr. Gene Williams of Sierra Pacific Power Company ("Sierra") dated August 27, 2010, California Pacific Electric Company, LLC (U 933-E) ("CalPeco")¹ supports the proposed use of the Institute of Electrical and Electronic Engineers ("IEEE") Standard 1366-2003 to categorize "major event days." It accordingly requests approval for making this change in CalPeco's reporting requirements with regard to its annual March 1 reliability report.

Background

In a letter to Sierra dated August 27, 2010, Mr. Clannon noted that Southern California Edison Company ("SCE") has recommended the adoption of the IEEE Standard for the definition of major event days. Use of the IEEE Standard would: 1) provide consistency in comparing reliability data from different utilities across the country; and 2) provide more objectivity in the determination of what major events are excludable for the purpose of calculating the reliability indices. Mr. Clannon further directed that if Sierra agreed with this proposal, Sierra should submit an advice letter requesting this change.

In an email to Mr. Robert Elliott of the CPUC Energy Division on November 3, 2010, Sierra reported that while Sierra had no objection to the recommendation of SCE, the responsibility to provide the CPUC with the requested reliability data would fall upon CalPeco. Therefore, Sierra did not file an advice letter formally requesting approval to make the change to its reporting requirements to use IEEE Standard 1366-2003.

On October 28, 2010, the Commission issued D.10-10-017, which approved Sierra's transfer to CalPeco of the California electric distribution facilities and the Kings Beach Generating Station that Sierra had owned and been operating. On January 1, 2011, the transfer from Sierra to CalPeco was completed and CalPeco then began operations as the utility with responsibility for serving the electric customers within Sierra's former California service territory.

¹ CalPeco also does business in California as "Liberty Energy - California Pacific Electric Company."

Proposed Changes

CalPeco agrees to utilize IEEE 1366-2003 to categorize major event days in its annual March 1 reliability report and now seeks approval to implement this change. It also agrees to report results from both methods for a period of three years starting with calendar year 2012 after which time CalPeco will only report the IEEE 1366-2003 calculation.

Implementation Date

This change in the method of calculating system reliability indices from that specified in CPUC Decision 96-09-45 will be effective on March 1, 2012. CalPeco will report results utilizing both methods for calendar years 2012, 2013, and 2014. Beginning in 2015, CalPeco will report results utilizing only IEEE 1366-2003.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or by email, any of which must be received no later than **April 14, 2011**, which is 20 days after the date of this filing. The protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. There is no restriction on who may file a protest. Protests should be mailed to:

CPUC Energy Division
Attention: Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102
Facsimile: (415) 703-2200
Email: mas@cpuc.ca.gov and jnj@cpuc.ca.gov

The protest also should be sent via email and U.S. Mail (and by facsimile, if possible) to CalPeco at the addresses show below on the same date it is mailed or delivered to the Commission.

California Pacific Electric Company, LLC
Attn.: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Fax: 905-465-4514
Email: bob.dodds@liberty-energy.com

With a copy to:
Steven F. Greenwald
Vidhya Prabhakaran
Davis Wright Tremaine LLP
505 Montgomery Street, Suite 800
San Francisco, CA 94111
Fax: 415-276-6599
Email: stevegreenwald@dwt.com

March 25, 2011

Effective Date

CalPeco requests that this Tier 2 advice filing become effective on regular notice, April 25, 2011, which is 30 calendar days after the date of filing.

Notice

In accordance with General Order 96-B, Section 4.3, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list.

If additional information is required, please contact Bob Dodds, President (bob.dodds@liberty-energy.com).

Sincerely,



Bob Dodds
President,
California Pacific Electric Company, LLC

Attachments

cc: CalPeco Advice Letter Service List

CalPeco**Advice Letter Filing Service List
General Order 96-B, Section 4.3**A.08-08-004 Service List

chilen@sppc.com
ljt@cpuc.ca.gov
jeffreygray@dwt.com
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A.09-10-028 and A.10-04-032 Service List

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Office of the General Counsel
Sierra Pacific Power Company
c/o NV Energy
6226 West Sahara Avenue
Las Vegas, NV 89146

Pacific Gas & Electric Company
77 Beale Street
San Francisco, CA 94106
PGETariffs@pge.com

Manager of Regulatory Affairs
San Diego Gas & Electric Company
P.O. Box 1831 - Room 10-A
San Diego, CA 92112

Director of Regulatory Affairs
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510

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73233 State Route 70
Portola, CA 96122-7069

Southern California Edison Company
P.O. Box 800
Rosemead, CA 91770

Truckee-Donner Public Utility District
P.O. Box 308
Truckee, CA 95734

Executive Director
California Energy Commission
1516 Ninth Street, MS-39
Sacramento, CA 95814

Honesto Gatchalian
California Public Utilities Commission
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505 Van Ness Avenue
San Francisco, CA 94102-3298

Maria Salinas
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