



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

In the Matter of the Application of Liberty
Utilities (CalPeco Electric) LLC (U 933 E) for
Commission Approval of the Customer Resiliency
Program

Application 22-02- _____
(Filed February 11, 2022)

FILED

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04:59 PM

A2202008

**APPLICATION OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933 E)
FOR COMMISSION APPROVAL OF THE CUSTOMER RESILIENCY PROGRAM**

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February 11, 2022

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I. INTRODUCTION AND SUMMARY

Pursuant to Section 701 of the California Public Utilities Code and Rule 2.1 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) files this Application (“Application”) for approval of a comprehensive Customer Resiliency Program (“CRP” or “Program”). Details of the CRP’s goal and structure are provided in the accompanying Testimony (See, Exhibit No. Liberty-01, hereinafter “Testimony”), including the associated ratemaking proposal.

Liberty provides electricity to approximately 49,000 customers in portions of seven counties around the Lake Tahoe area. The service territory is geographically compact and generally encompasses the western portions of the Lake Tahoe Basin (almost 80% of Liberty’s customers are in the Lake Tahoe Basin), extending north to Portola, and south to Markleeville. As described in Liberty’s Wildfire Mitigation Plan (“WMP”), approximately 94% of the service territory is in a high wildfire risk area.¹

Liberty has developed the comprehensive CRP to meet the needs of its vulnerable customers and critical stakeholders by providing reliable back-up power in the event of a wildfire, Public Safety Power Shutoff (“PSPS”), major storm or other event impacting service.²

¹ See, Liberty’s May 28, 2021, GRC Application (A.21-05-017), page 3.

² Liberty first identified the need for customer resiliency offerings driven by PSPS and winter storm outage events in 2020, when Liberty conducted a Stakeholder Engagement Survey to assess general customer interest and limitations around energy storage as a possible resiliency solution. Customers responded favorably, and Liberty initiated the process to develop a resiliency program. Background materials regarding some of these efforts can be found with other wildfire mitigation plan (“WMP”)

The Program is designed as a voluntary, opt-in structure (referred to as “Reliability as a Service” or “RaaS”) to address customers’ critical needs from potential prolonged outages and in regions with the highest customer resiliency benefits. Major storm events and prolonged interruptions of electric service are inevitable in the Lake Tahoe region because of altitude, the colder climate and heavily forested mountainous terrain.³ In December 2021, Liberty’s service territory was struck with three major snowstorms that damaged utility infrastructure, disrupted major highways, and left thousands of customers without power for lengthy periods. Providing safe and reliable electric service is paramount for Liberty, especially for its critical needs customers (i.e., Access and Functional Needs (“AFN”) and Medical Baseline customers).⁴ Liberty has designed the program to augment efforts being undertaken as part of its Wildfire Mitigation Plan (“WMP”) efforts and leverages a design approach used in the Commission’s Self-Generation Incentive Program (“SGIP”) for medical baseline and PSPS-impacted customers.⁵

The CRP is comprised of three program types: (1) a behind-the-meter battery energy storage system (“BTM BESS”); (2) the Kings Beach Resiliency Corridor Demonstration project; and (3) a mobile diesel generator program. The BTM BESS focuses on three sets of customers—Medical Baseline/AFN, Critical Infrastructure Facilities, and Large Commercial—that, in Liberty’s estimation, would provide the greatest social benefit to the customers in the service territory. These identified customer types are at highest risk across Liberty’s territory—from a health, safety, and economic perspective—as the result of outages, including medical baseline, critical facilities, and large commercial customers. Additionally, Liberty identified a portion of its territory around Kings Beach as a high-risk region for impactful outages, given its

data at <https://california.libertyutilities.com/north-lake-tahoe/residential/safety/electrical/wildfire-mitigation.html>.

³ See, Liberty’s *Electric System Reliability Annual Report for 2020 (Public Version)*, June 3, 2021, posted at: <https://california.libertyutilities.com/uploads/2020%20Draft%20Annual%20Reliability%20Report%20-%20PUBLIC.pdf>, “Top 10 major unplanned power outage events with a reporting year—2020,” page 25.

⁴ See, Liberty’s *Access and Functional Needs Plan for Public Safety Power Shutoff Support Pursuant to Commission Decision in Phase Three of R.18-12-005*, filed January 31, 2022, for additional information on efforts to assist AFN and Medical Baseline customers, which includes elements of the CRP presented here.

⁵ See, e.g., D.20-02-021 and D.21-06-005 in the SGIP docket, R.20-05-012.

populated location, the presence of critical infrastructure facilities like fire and police stations, jail, medical facilities, communications and water/waste-water facilities, and an economic center.

The BTM BESS features the provision of utility-owned and operated energy storage to Medical Baseline/AFN, Critical Infrastructure Facilities, and Large Commercial customers throughout the territory. This is a voluntary, opt-in program with a three-year enrollment duration beginning in 2023. The table below provides a general program overview.

TABLE 1
BTM BESS Summary

	Medical Baseline	Critical Facilities	Large Commercial
Objective	Provide resiliency services to customers to allow medical equipment to remain operational during outage events.	Provide resiliency services to critical public facilities that support customer health and safety during outage events.	Provide conditional technical assistance to large customers to investigate behind-the-meter ("BTM") storage and microgrid potential, and to provide resiliency services to participating customers.
Eligibility	Residential customers enrolled in Liberty's medical baseline program, including those with proof of medical equipment needs from a physician.	Customers who meet the CPUC definition of critical facilities (see D.19-05-042), expanded to include gas stations, grocery stores, and diesel fuel supply facilities.	Large commercial customers on Liberty's A-3 rate
Forecast of Participating Customers	117	35	21
Monthly RaaS Costs	Standard customers: \$10 CARE customers: no charge	Varies, but approximately \$4,000	Varies, but approximately \$4,000. Technical assistance estimated at \$15,000 per study.

The Kings Beach Resiliency Corridor Demonstration project is a means of enhancing reliability within a portion of the territory that includes certain critical infrastructure facilities. This program will augment the existing system hardening efforts already underway, such as the covered conductors between the existing 12 MW King Beach diesel generators, the associated substation and California highway 28 to keep the undergrounded parts of the area energized, which serves approximately 2,600 customers, including critical infrastructure and governmental

operations (police, fire, first responders) grocery stores, gas stations, and other services utilized by residents and tourists. The program will augment the existing generation within the designated circuits that has certain runtime limitations due to permitting restrictions, and essentially island that portion of the territory during extreme events when distribution disruptions may otherwise trip off existing generation.

The Mobile Diesel Generator Program proposed as part of the CRP is an application from “lessons learned” during the 2021 Tamarack Fire. During that event, Liberty rented a 1.5 MW mobile generator to maintain service to customers in the Markleeville areas while Liberty rebuilt the longer distribution line circuit that was destroyed by fire. The utilization of the mobile generator brought critical energy supplies to customers, emergency responders, and others that helped mitigate impacts from the wildfire and allowed the community to maintain continuity. Because such a significant portion of the Liberty service territory is in high fire risk areas, there is a potential that future wildfires or other events such as major storms could impact multiple communities simultaneously. To this end, with an eye toward the next wildfire season, the Mobile Diesel Generator Program would address a series of challenges should longer distance distribution circuits be damaged. Other program benefits are described in the Testimony.

Liberty proposes to issue Requests For Proposals for equipment and deployment of the program. This is a key aspect of the customer benefits whereby Liberty can use its procurement expertise to leverage BTM BESS on terms that should be much more favorable than if individual customers were to pursue the investments themselves. This is particularly the case for Medical Baseline/AFN customers who are less likely to have the capital to invest in a BTM BESS. Similarly, Liberty ownership and operation of the assets will provide benefits to customers across the Liberty system with respect to managing broader demand during ordinary operations time periods, which should result in mitigating systemwide demand during evening peak demand periods. Liberty’s ownership and operation will also provide equipment maintenance and performance over an extended time and provide direct experience with distributed storage operations on the system.

The BTM BESS is proposed to have a three-year open enrollment period, during which time participating customers will be enrolled and will receive the installed BESS. Liberty will then own and maintain the systems over a ten-year asset life, while customers make RaaS payments and gain benefits over this term. This Program design defers and distributes over time

upfront capital costs to customers, which is often a barrier to their participation, as well as ongoing operations and maintenance (“O&M”) costs. This Program may also deliver financial benefits to all customers through demand savings in the NV Energy contract.

RaaS payments and offerings are designed to meet the needs and limitations of each customer type.⁶ Medical Baseline customers particularly require additional financial support to adopt BTM BESS, given these customers often face financial constraints and limited government programs to offer this support. Liberty’s proposed offering for Medical Baseline customers is highly subsidized, such that customers will pay a maximum of \$10 per month and those on California Alternate Rates for Energy (“CARE”) rates will pay nothing. This approach provides affordable resiliency value to a vulnerable population, allowing Medical Baseline customers that want backup power through a BESS to receive it.

Critical Infrastructure Facilities and Large Commercial customers will also benefit from the Program, with no upfront system costs and a simplified process to evaluate BESS options to install and maintain. RaaS payments made by these customer types cover system and lifetime maintenance costs. The payments will vary based on the load requirement and size of the BESS. Large Commercial customers will also receive technical assistance to encourage participation.

II. THE PROGRAM IS THE MOST PRACTICAL AND COST-EFFECTIVE PROJECT TO ADDRESS LIBERTY’S SYSTEM NEEDS

A. Program Costs and Investment Recovery

Customers participating in the Program will have the utility BTM BESS and related utility infrastructure installed at their residence or business site. Monthly RaaS payments added to customers’ bills through the Program have been designed to meet the needs and limitations of each customer type:

- **Medical Baseline:** RaaS payments for medical baseline customers will be limited to a maximum of \$10 per month, with customers on CARE rates paying \$0. This \$10 per month payment represents an 8% increase to customers’ bills.⁷ While Liberty believes

⁶ Liberty will also explore potential grant opportunities under the Infrastructure Investment and Jobs Act of 2021 (H.R. 3684, Nov. 15, 2021) that may become available from the Dept. of Energy.

⁷ Through the Liberty Stakeholder Engagement Survey #2, customers indicated that a \$20 per month payment would be more than they could or would be willing to pay, so Liberty believes \$10 per month will better facilitate customer adoption.

the best Program engagement will come by customers paying at least a small monthly payment (e.g., \$10), Liberty does have the flexibility to reduce this monthly payment through economic assistance, if needed, without significant impact on the benefit-cost analysis. For example, reducing the monthly payment to \$0 through a promotional offer for half of Medical Baseline customers who would typically pay \$10 would decrease the net present value (“NPV”) by \$33,000 and reduces the internal rate of return (“IRR”) by 0.8% for the customer type, while the overall Portfolio level IRR would remain essentially unchanged at 11.8%.

- **Critical Facilities and Large Commercial:** RaaS payments from Critical Facilities and Large Commercial customers are estimated to be \$4,000 per month, which is based on expected total system costs and a storage system sized for facilities with an average daily energy consumption of 2,800 kWh and peak demand of 1 MW. Each customer’s actual monthly payment will depend on their resiliency needs and technology selection. Through the Liberty Stakeholder Engagement Survey #2, customers indicated that a lower monthly payment (in the \$2,000-\$3,000 per month range) would be more palatable to them, which may be achievable depending on system costs as well as a potentially lower level of resiliency needed for their facilities. For example, a hospital with an existing diesel generator may be interested in additional storage capacity through a BESS which would provide an additional layer of energy security.

B. Cost Benefit Analysis

Liberty’s benefit-cost analyses (“BCA”) accounted for the following cost components of the Program:

- Equipment costs for BESS
- Operation and maintenance costs for BESS
- Administration costs for Program design, marketing and outreach, and execution activities

Liberty proposes to highly subsidize equipment costs for medical baseline customers who might not otherwise be able to participate. Liberty also proposes covering the costs of Program administration, benefiting all customers in selecting and installing high quality technology. The programmatic outreach and marketing efforts would meaningfully expedite the exposure to system options and storage project cycle. Additionally, Liberty intends to provide technical

support for large commercial customers, which is essential to attract their participation and supports the overall Program benefit-cost ratio.

The following table displays the overlaying costs and benefits with expected customer participation and performance metrics for the Portfolio Phase 1 proposal. The results are shown for the Kings Beach Resiliency Corridor Demonstration project and for each targeted customer group participating in the BTM Program. All values are in net present value (2021\$) over the analysis period of thirteen years.⁸

TABLE 2
Program Phase 1 – Lifetime Present Values

	Kings Beach Microgrid Demonstration	BTM Customer Resiliency Program			Combined
		Medical Baseline	Critical Facilities	Large Commercial	
Total BESS Capacity (MWh)		5	32	19	55
Total Projects		117 ⁹	35 ¹⁰	21	173
Costs					
Equipment Costs	(\$2,039)	(\$3,027)	(\$20,553)	(\$12,009)	(\$37,627)
O&M Costs	\$0	(\$63)	(\$436)	(\$255)	(\$755)
Administration Costs	\$0	(\$769)	(\$930)	(\$1,087)	(\$2,787)
Benefits					
Societal Resiliency Value	\$16,814	\$78	\$30,384	\$79,251	\$126,528
Avoided Energy Contract Costs	TBD	\$464	\$3,190	\$1,864	\$5,517
Potential Utility Benefits		\$0	\$0	\$0	\$0
Resiliency Payments		\$46	\$17,123	\$10,004	\$27,173
Financial Metrics					
NPV w/o Societal Resiliency Value	To Be Demonstrated	(\$1,512)	\$3,937	\$2,037	\$4,462
IRR w/o Societal Resiliency Value		-15.2%	14.5%	13.4%	11.8%
Pre-Tax BCR w/o Societal Resiliency Value		0.13	0.93	0.89	0.79

⁸ System installations will take place over the initial three years, and the systems will have a 10-year of equipment useful life.

⁹ Liberty assumes 40% of total Liberty Medical Baseline customers will participate in the Program.

¹⁰ Liberty assumes 40% of total Critical Facilities and Large Commercial customers will participate in the Program.

	Kings Beach Microgrid Demonstration	BTM Customer Resiliency Program			Combined
		Medical Baseline	Critical Facilities	Large Commercial	
Post-Tax BCR w/o Societal Resiliency Value		0.61	1.18	1.15	1.35
NPV w/ Societal Resiliency Value	\$14,776	(\$1,434)	\$1	\$81,289	\$94,632
BCR w/ Societal Resiliency Value	8.25	0.15	2.31	6.83	3.87
Other Metrics					
Average Monthly Resiliency Payment		\$7 ¹¹	\$4,028	\$4,028	
Average Typical Monthly Bill		\$85	\$10,923	\$54,209	
Resiliency Payment as % of Mo. Bill		8%	37%	7%	12%
Resiliency Payment as % Total Costs		1%	78%	75%	66%

Two sets of financial metrics are presented, one without societal resiliency values and another with. The first four lines under financial metrics *without* societal resiliency values represent values exchanged with direct Liberty involvement, while the last four lines *with* societal resiliency values underscores the importance and financial upsides of pursuing the proposed resiliency initiatives that minimizes potential losses experienced by the local community during power outage events, outside of accounting ledgers.

C. Future Program Synergies

A grid modernization strategy will address a variety of key enabling building blocks that can foster cost-efficient extensibility of these preliminary resiliency investments. Systems such as an advanced distribution management system and distributed energy resource management system—as well as investments in advanced meter infrastructure, and advanced sensors and communications, and distribution automation—all support and extend both the BTM resiliency program as well as the resiliency corridors concepts. In time, these aligned investments can both lower overall costs and extend the capabilities of investments.

¹¹ This represents the effective Average Monthly Resiliency Payment for the portion of the Medical Baseline customers who contribute the \$10/month payment. This is the discounted value over the system lifetime of ten years.

III. REQUESTED RELIEF

For the reasons set forth in this Application and the Testimony, Liberty respectfully requests that the Commission:

- Approve Liberty’s Application to implement the Customer Resiliency Program;
- Determine that the CRP is in the public interest and should be pursued by Liberty;
- Approve Liberty’s proposed ratemaking treatment;
- Authorize Liberty to record the financing expenses associated with the CRP;
- Grant such other relief as is necessary to effectuate the Application and authorize rate recovery for the associated costs.

IV. RATEMAKING

Liberty proposes to establish the Customer Resiliency Program Memorandum Account (“CRPMA”) to track and record the actual revenue requirements associated with the Program as well as the monthly CRP-related RaaS payments collected from the customers. Specifically, Liberty will record the actual program O&M for the BESS units, including program administration costs and capital revenue requirement (i.e., depreciation and amortization, return on rate base, property taxes and income taxes) in the CRPMA by program. In addition, the actual monthly RaaS payments billed to the customers will be recorded to the CRPMA. To promote timely recovery of its expenditures, Liberty proposes recovering the annual capital-related revenue requirement recorded to the CRPMA through its annual Post Test Year Adjustment Mechanism (“PTAM”) filing, its 2025 GRC, or another Commission-authorized proceeding. This is further described in Testimony.

V. INFORMATION REQUIRED BY COMMISSION RULES

A. Identification of Statutory Authority

Liberty files this Application pursuant to Section 701 of the California Public Utilities Code, and Rule 2.1 of the (“Commission”) Rules of Practice and Procedure. The Application represents a comprehensive set of programs that will materially advance Liberty’s WMP, including its efforts to enhance safety and reliability for AFN and Medical Baseline customers as well as for Critical Infrastructure that is important to serve during PSPS and other major outage events.

B. Legal Name and Principal Place of Business; Correspondence or Communication Regarding this Application

Liberty is a California limited liability company. It has its principal place of business at 933 Eloise Avenue, South Lake Tahoe, California 96150.

All correspondence and communications regarding this Application should be addressed or directed as follows:

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Senior Manager of Rates & Regulatory Affairs
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C. Scoping Memo; Categorization; Hearings; Issues to be Considered; and Proposed Schedule

Pursuant to Rule 2.1(c), Liberty proposes the following categorization, need for hearings, issues to be considered, and proposed schedule.

1. Proceeding Category

In accordance with Rules 1.3(g), 2.1(c) and 7.1(e)(2), Liberty requests that this Application be categorized as a “ratesetting” proceeding within the meaning of Rules 1.3(g). This Application does not raise questions of policy or rules of general applicability or adjudicate any allegations or violations of law. In this Application, Liberty requests that the Commission establish mechanisms for it to seek recovery for certain costs it will incur to purchase and operate the identified equipment types as set forth in Testimony.

2. Need for Hearings

Liberty does not believe that approval of this Application should require hearings. Liberty has provided ample information, analysis, and documentation that provide the Commission with a sufficient record upon which to grant the relief requested on an *ex parte* basis.

However, if the Commission finds that hearings are necessary, Liberty respectfully requests that such hearings be conducted so as to enable the Commission to issue approval of the mobile generators in time for deployment for the 2022 wildfire season, with other program elements to follow if tracking of the Application is necessary.

3. Issues to be Considered

The following issues should be considered in this proceeding:

- Should the proposed Mobile Generator Program be approved, and should that approval occur in time to procure the generators for the 2022 wildfire season?
- Should the proposed BTM BESS project in the form of Resiliency as a Service as proposed be approved?
- Should the Kings Beach Resiliency Corridor Demonstration project be approved?
- Should the ratemaking treatment proposed in Testimony be approved?

4. Proposed Schedule

Liberty requests that the Commission approve the following proposed schedule which would resolve the Application within 18 months or less:

Date	Action Item
February 10, 2022	Application file date
+ 5 days	Daily Calendar Notice of Application
+ 30 days (Rule 2.6)	Protests Due
+ 10 days (Rule 2.6)	Reply to Protests Due
May 2022	Prehearing Conference
May 2022	ALJ/AC issues Scoping Memo
2 Q 2022	Intervenor Testimony Due
+ 18 days	Concurrent Rebuttal Testimony and Motions for Evidentiary Hearings
TBD 2022	Evidentiary Hearings (if needed)
TBD 2022	Concurrent Opening Briefs
TBD 2022	Concurrent Reply Briefs
TBD 2022	Proposed Decision Issued
TBD 2022	Comments Due on Proposed Decision
TBD 2022	Reply Comments on Proposed Decision
TBD 2022	Commission issues Final Decision

D. Organization and Qualification to Transact Business

Pursuant to Rule 2.2 and Public Utilities Code section 1004, a copy of the Articles of Organization of Liberty has previously been filed with the Commission as part of A.21-05-017. A Certificate of Status for Liberty issued by the California Secretary of State is attached to this Application as **Exhibit A**.

E. Statement of Proposed Rate Changes

Pursuant to Rule 3.1(h), Liberty states that it is not proposing any change in rates in this proceeding. As set out in Testimony, Liberty proposes establishing the Customer Resiliency Programs Memorandum Account (“CPRMA”) to track actual revenue requirements and will seek cost recovery through its Post Test Year Adjustment Mechanism (“PTAM”), its 2025 GRC or another Commission-authorized proceeding.

F. Notice and Service of Application

Liberty has given, or will give, proper notice within the time limits prescribed in the Commission’s Rules of Practice and Procedure. In addition, Liberty will provide electronic copies of this Application to representatives in the Energy Division and CalAdvocates.

G. Schedule of Certification, Construction, and Land Acquisition

The accompanying Testimony includes a schedule showing the program elements respective timelines, including for design, material acquisition, construction, testing, and operating dates as applicable. For the mobile generation, other than for the equipment procurement, there is no timeline other than Liberty’s desire to see approval so that the equipment may be available during the 2022 wildfire season.

H. Site Information and Full Description and Map of the Proposed Construction

While Liberty’s CRP elements can be seen as distribution facility additions, they are not extensions of facilities into any new portions of territory. Much of the work, particularly the Kings Beach Resiliency Corridor Demonstration project, would make some switching system modifications, more akin to a distribution lines modification covered under the GO-131-D, Section III (B)(1) (e) provision about “the placing of new or additional conductors, insulators, or their accessories on supporting structures already built” or Section III (C) regarding distribution facilities and substation work not requiring a CPCN.

I. Competing Entities and Cities and Counties Within Which Service Will be Rendered

Rule 3.1(b) requires a list of the names and addresses of all utilities, corporations, persons or other entities with which the proposed construction is likely to compete. The proposed CRP assets will be owned operated by Liberty. Through the CRP, Liberty will not compete with any other entity. While other entities can provide BTM BESS services, based on the program design as a voluntary opt-in program where the utility owns and operates the facilities for traditionally

underserved customer AFN/Medical Baseline segment, Liberty does not believe the CRP will be in competition with others. Similarly, the mobile generators for use by Liberty will not be in competition with others. Furthermore, the Kings Beach Resiliency Corridor program, as a WMP enhancement for customers, will not be in competition with other entities.

J. Required Franchises and Health and Safety Permits

Pursuant to Rule 3.1(d), the entities from which approvals for the proposed CRP have been or must be obtained, and the franchises and such health and safety permits that public authorities have required or may require for the proposed Project construction are limited to the local counties in which the Kings Beach Resiliency Corridor Demonstration will be built and eventual BTM BESS installations that customers choose to have installed.

K. Statement of Estimated Cost of the Project

Estimated costs and benefits for elements of the CRP are provided in the Testimony in the context of a cost and benefit analysis. The BTM BESS element has an estimated cost of \$35.589 million (2021\$); The Kings Beach Resiliency Corridor element has an estimated cost of \$2.039 million (2021\$); The Mobile Diesel Generator element has an estimated capital cost of \$900,000 per generator set and an estimated operations and maintenance cost of \$60,000 per unit per year. Additional information about the cost estimates are set out in the Testimony.

L. Load and Resource Data and Existing Rated and Effective Operating Capacity

Given the nature of the CRP as advancing reliability for AFN/Medical Baseline and Critical Infrastructure customers during PSPS and other major outages, the Program does not impact existing system loads and augments Liberty’s generation through application of BTM BESS. Similarly, the Mobile Diesel Generators contemplated in the Application would be for emergency uses to more promptly restore localized electric service while system reconstruction is underway. Information regarding loads and reliability are provided in the Testimony.

M. Financial Ability to Render Proposed Service and Finance Program

Liberty has the financial capability to undertake the CRP as proposed prior to presentation of actual costs for recovery as discussed in the Testimony.

N. Safety and Reliability Information

The core principles at the heart of the CRP include safety and reliability enhancements for AFN and Medical Baseline customers, as well as “critical facilities and infrastructure” as defined in Liberty’s 2021 WMP Update, which references D.19-05-042 as modified by D.20-05-

051. Please refer to Testimony regarding the reliability and safety benefits of the CRP. All construction and installation work will be performed pursuant to Liberty standard practices and applicable Commission general orders as well as any permit conditions that may be adopted.

O. Cost Analysis and Financial Impact of Project

A cost and benefits analysis is set forth in the Testimony, as well as how project funding would be addressed over time.

P. CEQA Compliance

Liberty believes that none of the elements of the CRP would trigger the need for CEQA review. There is no CEQA “project” proposed here, and as previously noted, the work on the Kings Beach Resiliency Corridor Demonstration should be exempt from CEQA as contemplated by GO 161-D, and the BTM BESS would similarly be exempt as distribution asset “accessories.”

February 11, 2022

Respectfully submitted,

/s/

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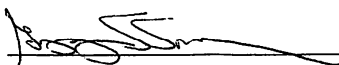
Attorneys for Liberty Utilities (CalPeco Electric) LLC

OFFICER VERIFICATION FORM

I am an officer of the applicant organization herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2/18/22 at Downey, California.

A handwritten signature in black ink, appearing to read 'Gregory Sorensen', is written over a solid horizontal line.

Gregory Sorensen
President, West Region
Liberty Utilities

EXHIBIT A
Certificate of Status



Secretary of State
Certificate of Status

I, SHIRLEY N. WEBER, Ph.D., Secretary of State of the State of California, hereby certify:

Entity Name: LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
File Number: 200910410277
Registration Date: 04/14/2009
Entity Type: DOMESTIC LIMITED LIABILITY COMPANY
Jurisdiction: CALIFORNIA
Status: ACTIVE (GOOD STANDING)

As of April 6, 2021 (Certification Date), the entity is authorized to exercise all of its powers, rights and privileges in California.

This certificate relates to the status of the entity on the Secretary of State's records as of the Certification Date and does not reflect documents that are pending review or other events that may affect status.

No information is available from this office regarding the financial condition, status of licenses, if any, business activities or practices of the entity.



IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of April 7, 2021.

SHIRLEY N. WEBER, Ph.D.
Secretary of State

Certificate Verification Number: Y69DMVY

To verify the issuance of this Certificate, use the Certificate Verification Number above with the Secretary of State Certification Verification Search available at bizfile.sos.ca.gov/certification/index.