



# 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: Daniel W. Marsh

Phone #: 562-299-5104

E-mail: Dan.Marsh@libertyutilities.com

E-mail Disposition Notice to: Dan.Marsh@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) #: 129-E

Tier Designation: Tier 2

Subject of AL: Energy Savings Assistance Pilot Implementation Plan

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-07-015

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 10/10/19

No. of tariff sheets: N/A

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Daniel W. Marsh  
Title: Manager, Rates and Regulatory Affairs  
Utility Name: Liberty Utilities (CalPeco Electric) LLC  
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City: Downey State: California  
Telephone (xxx) xxx-xxxx: 562-299-5104  
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Email: Dan.Marsh@libertyutilities.com

Name:  
Title:  
Utility Name:  
Address:  
City: State: Wyoming  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
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## 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	



Liberty Utilities (CalPeco Electric) LLC  
933 Eloise Avenue  
South Lake Tahoe, CA 96150  
Tel: 800-782-2506  
Fax: 530-544-4811

October 10, 2019

**VIA EMAIL AND UPS**

**Advice Letter No. 129-E  
(U 933-E)**

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

**Subject: ESA Pilot Implementation Plan**

**I. PURPOSE**

Pursuant to Commission Decision (D.) 18-08-020, Liberty Utilities (CalPeco Electric) LLC (U 933 E) ("Liberty CalPeco") hereby submits a Pilot Implementation Plan to implement multi-family common measures.

**II. BACKGROUND**

In Ordering Paragraph 32 of Decision (D.) 18-08-020, Liberty CalPeco was authorized to implement a multi-family common area measures program as part of its Energy Savings Assistance ("ESA") program. D.18-08-020 also directed Liberty CalPeco to submit a Pilot Implementation Plan for the pilot program via a Tier 2 Advice Letter. The plan was authorized on a pilot basis.

**III. PILOT IMPLEMENTATION PLAN**

**A. Pilot Description**

The purpose of Liberty CalPeco's Energy Savings Assistance Multi-Family Common Area Measures Pilot Program ("ESA Pilot") is to deploy energy savings measures in common areas of apartment buildings that primarily serve low-income residents. This program is designed as a supplement to Liberty CalPeco's ESA program, which provides energy efficiency ("EE") measures for individual units, but not common areas of multi-family dwellings.

## **B. Pilot Rationale and Expected Outcomes**

The multi-family affordable housing units in the Liberty CalPeco service territory that have been evaluated for treatments under this pilot program present many opportunities for energy efficiency upgrades. The installation of EE measures in these multi-family residences will provide more livable and comfortable common spaces for all residents, reduce overall energy use, and potentially help keep rents affordable by lowering the cost of operations for property owners. In addition, treatments in common areas provide an educational opportunity for all residents, whether or not they have participated in the ESA program.

The ESA Pilot serves a need not currently being filled by Liberty CalPeco's other energy efficiency programs, which focus on residential, commercial, and school treatments, but have to this point not focused on multi-family common areas. By utilizing contractors that have experience in energy efficiency upgrades, with oversight by Liberty CalPeco, the program will be delivered in a competent and cost-effective manner.

Liberty CalPeco intends to implement the ESA Pilot at all eligible multi-family properties in its service territory willing to participate. These properties include ten locations identified by the Solar on Multi-family Affordable Housing ("SOMAH") Program, as shown in Appendix 1, Table 1. Liberty CalPeco plans on coordinating with its ESA program administrator, Richard Heath & Associates, Inc. ("RHA"), to schedule EE treatments of qualified residential units and common area portions of multi-family properties during the same time frame to maximize efficient ESA and ESA Pilot program delivery.

## **C. Evaluation, Measurement and Verification (EM&V) Plan**

Liberty CalPeco will contract with RHA to deploy contractors to inspect, evaluate and measure results of completed common area treatments. The anticipated results of the ESA Pilot include:

- Common area measures ("CAM") installed at five or more multi-family affordable housing properties that include all appropriate measures approved in ESAP.
- Total energy savings MWh per year at each location to be estimated pending initial building assessments

## **D. Implementation Criteria**

As stated in the ESA Policy and Procedures manual, qualifying multi-family buildings in Liberty CalPeco's service territory will meet the following criteria:

- Multi-family buildings are defined as "those with five or more attached units"

- Eligible buildings “must be dedicated to providing affordable housing to low-income Californians in deed restricted, government and non-profit owned multifamily buildings”
- At least 65% of all occupied units in that multifamily building must be occupied by low income households eligible for the ESA Program
- Eligible measures which can be implemented found in Table 5-1 of the Policy and Procedures manual, pp. 31-33

#### **E. Schedule**

Liberty CalPeco’s ESA Pilot program is scheduled to continue through ESA program year 2020. The ESA Pilot was not implemented in 2018. The 2019 timeline is described below.

- **September-October, 2019:**
  - Conduct outreach to all identified eligible multi-family properties to enlist participation in the Liberty CalPeco ESA Pilot
  - Coordinate outreach with Liberty CalPeco’s promotion of the ESA program to tenants of these multi-family properties.
  - Work with RHA and installation contractors to schedule treatments of eligible and willing residential units with common areas
- **October, 2019:**
  - Contract with RHA for delivery (via subcontractor) of energy efficiency common area energy efficiency assessments and treatments
  - Gain agreement with proper owners on measures to be implemented
- **November – December, 2019:**
  - Contractors deploy first round of common area treatments at participating multi-family residences
  - Continue outreach efforts to identify eligible properties for participation in 2020 program year
- **January, 2020:**
  - Report on pilot program prepared for submission in Liberty CalPeco’s Low Income Assistance Programs 2020 Annual Report
  - Previous year unspent funds rolled over into 2020 program year

#### **F. Budget**

The ESA Pilot budget for 2019, shown in Appendix 1, Table 2, includes estimated expenditures for marketing, evaluation, outreach and other administrative costs, collectively categorized as Administrative. Measure installations include all contractor labor and materials. The authorized

ESA and ESA Pilot budgets by program year per D.18-08-020 are illustrated in Appendix 1, Table 3.

#### **IV. TIER DESIGNATION**

Pursuant to General Order 96-B, Section 5, this Advice Letter is being submitted with a Tier 2 designation.

#### **V. EFFECTIVE DATE**

Liberty CalPeco requests that this Tier 2 Advice Letter become effective October 10, 2019.

#### **VI. 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 October 30, 2019, which is 20 days after the date 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, 4<sup>th</sup> Floor  
San Francisco, CA 94102-3298  
Facsimile: (415) 703-2200  
Email: [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

The protest should be sent via email and U.S. Mail (and by facsimile, if possible) 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  
Fax: 530-544-4811  
Email: [Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com)

Energy Division Tariff Unit  
California Public Utilities Commission  
October 10, 2019  
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## **VII. 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.

If additional information is required, please do not hesitate to contact me.

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

*/s/ Daniel W. Marsh*

Daniel W. Marsh  
Liberty Utilities (CalPeco Electric) LLC  
Manager, Rates and Regulatory Affairs  
Phone: 562-299-5104  
Email: Dan.Marsh@libertyutilities.com

cc: Liberty CalPeco General Order 96-B Service List  
A.15-02-001 Service List



Liberty Utilities (CalPeco Electric) LLC  
Advice Letter Filing Service List  
General Order 96-B, Section 4.3

**VIA EMAIL**

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## Appendix 1 – Liberty CalPeco ESA Pilot Tables

<b>Table 1 - Multi-family Affordable Housing in Liberty CalPeco's Service Territory</b>				
<b>Project Name</b>	<b>City</b>	<b>Zip</b>	<b>Affordable Units</b>	<b>Total Units</b>
Tahoe Senior Plaza	South Lake Tahoe	96150	44	44
Sky Forest Acres	South Lake Tahoe	96150	17	17
Kelly Ridge	South Lake Tahoe	96150	32	33
Sierra Garden Apartments	South Lake Tahoe	96150	75	76
Kings Beach Housing Now (Site A)	Kings Beach	96143	75	77
The Aspens at South Lake	South Lake Tahoe	96150	47	48
Tahoe Pines Apts.	South Lake Tahoe	96150	27	28
Woodfords LIHTC	Markleeville	96120	24	24
Tahoe Valley Townhomes	South Lake Tahoe	96150	68	70
Bijou Woods Apartments	South Lake Tahoe	96150	90	92
<b>Total</b>			<b>499</b>	<b>509</b>

<b>Table 2 - Liberty CalPeco's ESA Pilot Annual Budget</b>	
<b>Budget Category</b>	<b>Estimated Expense</b>
Administrative	\$5,000
Measure Installations	\$45,000
<b>Total</b>	<b>\$50,000</b>

<b>Table 3 - Liberty Approved ESA Budgets PYs 2018-2020</b>				
<b>Budget Categories</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>Total</b>
Outreach	\$69,200	\$70,584	\$71,996	\$211,780
Inspections	\$4,174	\$4,257	\$4,343	\$12,774
General	\$86,551	\$88,282	\$90,048	\$264,881
<b>Subtotal Admin</b>	<b>\$159,925</b>	<b>\$163,124</b>	<b>\$166,386</b>	<b>\$489,435</b>
Weatherization/ Measures	\$495,401	\$505,309	\$515,415	\$1,516,125
Measures (New in 2017)	\$0	\$0	\$0	\$0
<b>NEW Multi Family Common Treatment</b>	<b>\$50,000</b>	<b>\$51,000</b>	<b>\$52,020</b>	<b>\$153,020</b>
Energy Education	\$26,725	\$27,260	\$27,805	\$81,790
<b>Subtotal Program</b>	<b>\$522,126</b>	<b>\$532,569</b>	<b>\$543,220</b>	<b>\$1,597,915</b>
<b>Total Program</b>	<b>\$732,051</b>	<b>\$746,693</b>	<b>\$761,626</b>	<b>\$2,240,369</b>