



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 #: 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) #: 120-E

Tier Designation: 1

Subject of AL: 2019 Affiliate Transaction Compliance Plan

Keywords (choose from CPUC listing): Affiliate

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-05-040

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: N/A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: 6/28/19

No. of tariff sheets: 0

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:

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: Manager, Rates and Regulatory Affairs
Utility Name: Liberty Utilities (CalPeco Electric) LLC
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Name:
Title:
Utility Name:
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City: State: Wyoming
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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
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Tel: 800-782-2506
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June 28, 2019

VIA EMAIL AND UPS

**Advice Letter No. 120-E
(U 933-E)**

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

SUBJECT: 2019 Affiliate Transaction Compliance Plan

Purpose

Liberty Utilities (CalPeco Electric) LLC (U 933 E) ("Liberty CalPeco") hereby submits the 2019 Affiliate Transaction Compliance Plan ("Compliance Plan") in accordance with the California Public Utilities Commission's ("Commission") Decision (D.) 97-12-088, as amended by D.98-08-035, D.98-12-075, D.99-09-002, and D.02-02-046. The attached Compliance Plan presents the most current information for Liberty CalPeco regarding its affiliate transaction compliance efforts.

Background

The Commission's affiliate transaction rules for electric utilities ("Affiliate Rules") were initially adopted in D.97-12-088, and modified by D.98-08-035, D.98-12-075, D.99-09-002, and D.02-02-046. Liberty CalPeco is an "electric utility" under the Affiliate Rules and, pursuant to Rule II.B, the Affiliate "Rules apply to all utility transactions with affiliates engaging in the provision of a product that uses electricity, or the provision of services that relate to the use of electricity," unless otherwise exempted from the Affiliate Rules.

Section VI.A of Appendix A of D.97-12-088 requires Liberty CalPeco to file a Compliance Plan by Advice Letter no later than June 30, 2017. Consequently attached is Liberty CalPeco's 2019 Affiliate Transactions Compliance Plan.

Compliance Plan

This Compliance Plan is responsive to Rule VI.A and describes the manner in which Liberty CalPeco currently has programs and procedures in place to best ensure compliance with the Affiliate Rules by itself and its affiliates. Liberty CalPeco believes that the compliance actions set

forth in the attached revised Compliance Plan are consistent and comply fully with the Affiliate Rules. Liberty CalPeco remains committed to upholding both the letter and spirit of the Rules, and respectfully requests that the Commission approve its 2019 Compliance Plan.

Effective Date

In accordance with General Order 96-B, General Rule 7.6.1 and Energy Industry Rule 5.1, Liberty CalPeco submits this Tier 1 Advice Letter with an effective date of June 28, 2019.

Notice

In accordance with General Order 96-B, Section 4.4, a copy of this Advice Letter has been served electronically to the entities shown on the service lists for GO 96-B and R.97-04-011, I.97-04-012, and R.98-04-009, copies of which are attached. The Compliance Plan referenced herein is being provided to the Energy Division Staff only. Other entities may request a copy of the Compliance Plan by sending an email to: Greg.Campbell@libertyutilities.com.

Protests

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or by email, any of which must be received no later than July 18, 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, 4th Floor
San Francisco, CA 94102-3298
Facsimile: (415) 703-2200
Email: 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:

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Attn: Advice Letter Protests
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Email: Dan.Marsh@libertyutilities.com

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Energy Division Tariff Unit
California Public Utilities Commission
June 28, 2019
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If additional information is required, please do not hesitate to contact me.

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/ Daniel W. Marsh

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Liberty Utilities (CalPeco Electric) LLC

Manager, Rates and Regulatory Affairs

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cc: Liberty CalPeco General Order 96-B Service List
CPUC Service Lists R.97-04-011/I.97-04-012 and R.98-04-009 (Advice Letter Only)

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

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