



# 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) #: 122-E

Tier Designation: 1

Subject of AL: Language Changes to Liberty CalPeco Preliminary Statement 13.1 GRCMA

Keywords (choose from CPUC listing): GRC

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-05-007

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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: 7/19/19

No. of tariff sheets: 2

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: 41-H

Service affected and changes proposed<sup>1</sup>: Change in GRCMA tariff language

Pending advice letters that revise the same tariff sheets:

<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: Dan Marsh  
Title: Manager, Rates and Regulatory Affairs  
Utility Name: Liberty Utilities (CalPeco Electric) LLC  
Address: 9750 Washburn Road  
City: Downey State: California  
Telephone (xxx) xxx-xxxx: 562-299-5104  
Facsimile (xxx) xxx-xxxx:  
Email: Dan.Marsh@libertyutilities.com

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

## 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

July 19, 2019

**VIA EMAIL AND UPS**

**Advice Letter 122-E  
(U 933-E)**

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

**Subject: Liberty Utilities (CalPeco Electric) LLC (U 933-E) – Language Changes to  
Liberty CalPeco Preliminary Statement 13.1 GRCMA**

**Purpose**

Pursuant to Decision (D.) 19-05-007, Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty CalPeco”) hereby submits this **Tier 1** Advice Letter to revise language in its Preliminary Statement 13.1, General Rate Case Memorandum Account (“GRCMA”) tariff.

Attachments following the Advice Letter summary include redlined and clean versions of the impacted tariff sheets.

**Discussion**

This Advice Letter updates language in Liberty CalPeco’s Preliminary Statement 13.1. The following changes are being made to the respective tariff pages/rates:

General Rate Case Memorandum Account (GRCMA). As stated in the Account Disposition section of the GRCMA Preliminary Statement, recovery costs for the shortfall or over-collection of the difference resulting from the difference in general rates effective December 31, 2018 and the final rates authorized by the Commission in Application (A.) 18-12-001.

**Effective Date**

Liberty CalPeco requests that this **Tier 1** Advice Letter be effective as of January 1, 2019.

**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 August 8, 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.

Energy Division Tariff Unit  
California Public Utilities Commission  
July 19, 2019  
Page 2

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](mailto:edtariffunit@cpuc.ca.gov)

The protest should be sent via email and U.S. Mail to Liberty CalPeco 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: [Greg.Campbell@libertyutilities.com](mailto:Greg.Campbell@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 list.

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

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

*/s/ Greg Campbell*

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Greg Campbell  
Liberty Utilities (CalPeco Electric) LLC  
Sr. Rate Analyst, Rates and Regulatory Affairs  
Phone: (562) 299-5117  
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Attachments

cc: Liberty CalPeco Advice Letter Service List  
A.18-12-001 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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dan.marsh@libertyutilities.com;  
sharon.yang@libertyutilities.com;  
ginge@kinectenergy.com

**PRELIMINARY STATEMENT**  
(Continued)

**13. MEMORANDUM ACCOUNTS (Continued)**

**I. General Rate Case Memorandum Account (GRCMA)**

i. PURPOSE

Pursuant to Commission Decision ~~195-0512-00735~~ issued ~~May~~December 208, 201~~95,~~ the purpose of the GRCMA is to ~~record the shortfall or overcollection resulting from the difference between the general rates effective as of December 31, 2015 and the final general rates the Commission shall authorize in a decision it will issue in Application (A.) 15-05-008.~~track the difference in revenue requirement in effect on December 31, 2018 and the revenue requirement Liberty Utilities proposed in Application (A.) 18-12-001. As such, the GRCMA is effective January 1, 201~~96.~~

ii. APPLICABILITY

The GRCMA shall apply to all customers unless otherwise specified by the Commission.

iii. ACCOUNTING PROCEDURES

The GRCMA will track the revenue requirement related to the generation and distribution rate components. Liberty Utilities shall maintain the GRCMA by making entries as follows:

1. A debit entry ~~equal to the difference between Liberty Utilities' current and approved monthly non-fuel generation and distribution base margin revenue requirement in effect on December 31, 2018 and the revenue requirement it proposed in A.18-12-001, approved in D.16-12-024 for the period beginning January 1, 2019.~~ ~~between January 1, 2016 and December 31, 2016. The entries will be recorded upon the new rates authorized in D.16-12-024 becoming effective.~~
2. ~~A credit entry to Liberty Utilities' FERC revenue accounts that is the difference between Liberty Utilities' current and approved monthly non-fuel generation and distribution base margin revenue requirement approved in D.16-12-024 for the period beginning between January 1, 2019 and December 31, 2016. The entries will be recorded upon the rates authorized in D.16-12-024 becoming effective.~~

(Continued)

**PRELIMINARY STATEMENT**

(Continued)

**13. MEMORANDUM ACCOUNTS (Continued)**

**I. General Rate Case Memorandum Account (GRCMA)**

i. PURPOSE

Pursuant to Commission Decision 19-05-007 issued May 20, 2019, the purpose of the GRCMA is to track the difference in revenue requirement in effect on December 31, 2018 and the revenue requirement Liberty Utilities proposed in Application (A.) 18-12-001. As such, the GRCMA is effective January 1, 2019.

ii. APPLICABILITY

The GRCMA shall apply to all customers unless otherwise specified by the Commission.

iii. ACCOUNTING PROCEDURES

The GRCMA will track the revenue requirement related to the generation and distribution rate components. Liberty Utilities shall maintain the GRCMA by making entries as follows:

1. A debit entry equal to the difference between Liberty Utilities' current revenue requirement in effect on December 31, 2018 and the revenue requirement it proposed in A.18-12-001, beginning January 1, 2019.

(Continued)



**PRELIMINARY STATEMENT**  
(Continued)

**13. MEMORANDUM ACCOUNTS** (Continued)

**I. General Rate Case Memorandum Account (GRCMA)** (Continued)

iii. ACCOUNTING PROCEDURES (Continued)

~~3. A monthly credit entry equal to the revenue billed through the GRCMA rates in the customer rate schedules.~~

42. A monthly entry equal to interest on the average balance in the account at the beginning of each month starting January 201917 and the balance after entry iii.1. ~~through iii.3. above~~, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper – Non-Financial for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

iv. ACCOUNT DISPOSITION

~~Pursuant to Decision 16-12-02419-05-007, Ordering Paragraph 5 “[t]he balances recorded in Liberty Utilities (CalPeco Electric) LLC (U933E) General Rate Case Revenue Requirement Memorandum Account, authorized by Decision 195-0512-00735 on May December 167, 20195, shall be amortized in rates beginning January 1, 20197 through December 31, 2018.” the remaining balance in the GRCMA will be addressed in the final decision in A.18-12-001.~~

~~Liberty Utilities will identify the amount which is being collected through the GRCMA as a separate line item in its bills.~~

~~If any remaining balance in the GRCMA will exist as of December 31, 202118, Liberty Utilities will provide a proposal in its next GRG application for its disposition.~~

Issued by

Advice Letter No. 72122-E  
20196

Gregory S. Sorensen

Date Filed July 19~~December 28,~~

Decision No. D.19-05-007

Name  
President  
Title

Effective January 1, 20197

Resolution No. \_\_\_\_\_

**PRELIMINARY STATEMENT**  
(Continued)

**13. MEMORANDUM ACCOUNTS** (Continued)

**I. General Rate Case Memorandum Account (GRCMA)** (Continued)

iii. ACCOUNTING PROCEDURES (Continued)

2. A monthly entry equal to interest on the average balance in the account at the beginning of each month starting January 2019 and the balance after entry iii.1., at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper – Non-Financial for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

iv. ACCOUNT DISPOSITION

Pursuant to Decision 19-05-007, the remaining balance in the GRCMA will be addressed in the final decision in A.18-12-001.