



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) #: 124-E

Tier Designation: Tier 1

Subject of AL: Emergency Disaster Relief Program Outreach Plan and Catastrophic Event Memorandum Account

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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: N/A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: 10/9/19

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: N/A

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: Daniel W. Marsh
Title: Manager, Rates and Regulatory Affairs
Utility Name: Liberty Utilities (CalPeco Electric) LLC
Address: 9750 Washbur 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

September 9, 2019

VIA EMAIL AND UPS

**Advice Letter 124-E
(U 933-E)**

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

Subject: Liberty Utilities (CalPeco Electric) LLC (U 933-E) – Emergency Disaster Relief outreach plan for Customer Protection

Purpose

In accordance with Decision (“D.”) 19-07-015, Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty CalPeco”) hereby submits this Tier 1 Advice Letter related to the Commission’s adopted emergency disaster relief protections.

Discussion

In accordance with Ordering Paragraph No. 8 in D.19-07-015, Liberty CalPeco is filing this advice letter to implement its Emergency Disaster Relief Program Outreach Plan. The communications outreach plan describes the emergency relief customer protections and outreach activities for all disasters in which the Governor of California or the President of the United States declares a state of emergency.

In addition, pursuant to Ordering Paragraph No. 5 in D.19-07015, Liberty CalPeco is authorized to track the associated costs with the emergency relief customer protections in its Catastrophic Event Memorandum Account (“CEMA”) and extend the applicability of the CEMA to costs for implementing customer protections for all disasters in which the Governor of California or the President of the United States has declared an emergency. Liberty CalPeco is therefore modifying Preliminary Statement, 13.A Catastrophic Event Memorandum Account (CEMA), to allow for the recovery of associated costs related with the emergency customer protections in CEMA and specifying that the entries in CEMA will be segregated by qualifying event. Clean and red-lined copies of the modified tariff pages are attached.

Effective Date

Liberty CalPeco requests that this Tier 1 Advice Letter be effective as of September 9, 2019.

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 September 29, 2019, which is 20 days

Energy Division Tariff Unit
California Public Utilities Commission
September 9, 2019
Page 2

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 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

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/ 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

Attachments

cc: Liberty CalPeco Advice Letter Service List
Service List of A.18-03-011

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

VIA EMAIL

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bhodgeusa@yahoo.com;
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cem@newsdata.com;
dietrichlaw2@earthlink.net;
ericj@eslawfirm.com;
clerk-recorder@sierracounty.ws;
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mas@cpuc.ca.gov;
txb@cpuc.ca.gov;
efr@cpuc.ca.gov;
tlg@cpuc.ca.gov;
dao@cpuc.ca.gov;
ljt@cpuc.ca.gov;
mmg@cpuc.ca.gov;
kjl@cpuc.ca.gov;
denise.tyrrell@cpuc.ca.gov;
fadi.daye@cpuc.ca.gov;
winnie.ho@cpuc.ca.gov;
usrb@cpuc.ca.gov;
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stevegreenwald@dwt.com;
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judypau@dwt.com;
dwtcpucdockets@dwt.com;
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travis.ritchie@sierraclub.org;
dan.marsh@libertyutilities.com;
sharon.yang@libertyutilities.com;
ginge@kinectenergy.com



MEMORANDUM

TO: California Public Utilities Commission

FROM: Liberty Utilities (CalPeco Electric) LLC ("Liberty CalPeco")

DATE: September 9, 2019

RE: Liberty CalPeco Emergency Disaster Relief Program Outreach Plan

Liberty CalPeco has developed the following communications outreach plan to notify customers and other key audiences of the specific, mandated protections established in Resolutions M-4833 and M-4835 for customers of California regulated utilities who are directly impacted by disaster situations.

This outreach plan was developed to meet compliance with Decision 19-07-015 that was approved by the California Public Utilities Commission (CPUC) on July 11, 2019. The outreach effort will be ongoing and continuous, or until directed otherwise by the CPUC or the State of California.

Strategy

Liberty CalPeco will alert all customers of emergency relief customer protections that will be implemented in the event that the Governor of California or President of the United States declares a state of emergency because a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service.

CPUC Resolution M-4833 offers the following permanent protections for electric customers:

- Waive deposit requirements for residents seeking to re-establish service for one year and expedite move-in and move-out service requests;
- Stop estimated energy usage for billing attributed to the time period when the home/unit was unoccupied as a result of the emergency;
- Discontinue billing;
- Prorate any monthly access charge or minimum charges;
- Implement payment plan options for residential customers;
- Suspend disconnection for non-payment and associated fees, waiver of deposit and late fee requirements; and
- Provide support for low-income residential customers.

Additionally, in the event that emergency disaster relief protections are triggered for a specific community, Liberty CalPeco will execute reactive outreach to support customers and ensure they have information regarding the program.

Tactical Action Plan

Liberty CalPeco will notify customers, both water and electric, of protections provided by the Emergency Disaster Relief Program in the following ways (posted and updated as needed):

- **Website** – Liberty CalPeco will add a new ‘Emergency Disaster Relief Program’ page that is easy for customers to identify and will also post clickable links on all California service area pages of the website.
- **Social Media** – Liberty CalPeco will post content highlighting the emergency relief customer protections on the utility’s Twitter and/or Facebook pages at least once per month.
- **Customer Email/Newsletter** – Liberty CalPeco will disseminate at least one customer email or newsletter per year to educate regarding emergency relief customer protections.
- **Bill Insert/Mail** – Liberty CalPeco will issue at least one bill insert or direct mail postcard per year to all customers to educate regarding emergency relief customer protections.
- **News Release/Media Advisory** – Liberty CalPeco will issue a news release or media advisory to all media organizations that cover its service areas, upon launching the new Emergency Disaster Relief Program. This news release will be issued during the period from Sept. 1-Dec. 31, 2019.
- **Community Outreach** – Liberty CalPeco will develop a flyer that can be distributed when it attends community events and made available at all local Customer Service Offices.
- **Customer Ambassadors/Employees** – Liberty CalPeco will develop and issue detailed information regarding the Emergency Disaster Relief Program to employees, so they are equipped to answer any questions from customers.
- **Outreach to Low-Income Customers** – Liberty CalPeco will include information regarding emergency relief customer protections when Liberty CalPeco issues communications to low-income customers enrolled in the utility’s California Alternative Rates for Energy (CARE) or California Alternative Rates for Energy (CARE) programs.

The following tactics will be executed to a targeted group of customers who may have been impacted by a disaster event. These tactics will occur as soon as possible (factoring local conditions), following the declaration of a state of emergency:

- **Targeted Outreach (Impacted Customers)** – Liberty CalPeco will attempt to contact impacted customers by direct mail or door notice when emergency relief customer protections are triggered for a community to alert them regarding protections.

- **Local Governments** – Liberty CalPeco will alert local governments and elected officials via email or by phone regarding emergency relief customer protections available to customers.
- **Outbound Dialing** – Liberty CalPeco will place outbound ‘Reverse 911’ calls throughout any Liberty CalPeco community impacted by a disaster within 72 hours of the conclusion of an event to alert customers regarding emergency relief customer protections.
- **Customer Contact Center** – Liberty CalPeco operates a 24-hour emergency hotline equipped to answer calls from customers seven days a week, 365 days a year. Representatives will be available to provide information to customers regarding service interruptions, restoration events and relief support. When possible, Liberty CalPeco will also attempt to utilize its local Customer Service Office to answer customer questions during normal business hours.
- **Community Outreach Centers & City/County Assistance Centers** – Liberty CalPeco is in the process of working with local emergency agencies and community-based organizations that serve income-eligible customers to identify appropriate community outreach centers in each service area and ensure awareness of available customer protections. When plans are finalized, information regarding Community Outreach Centers will be posted to the utility’s website and shared via social media (reactive). The utility will plan to have trained representatives at local assistance centers to work in-person with impacted customers.

All content intended for customers will be translated and disseminated in English, Spanish, Chinese, Tagalog, Vietnamese, as well as Korean and Russian if needed. Please note, social media parameters may prohibit the sharing of information in multiple languages. All digital content intended for customers will additionally be compliant with ADA regulations.

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LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
SOUTH LAKE TAHOE, CALIFORNIA

3rd~~2nd~~ Revised
2nd~~1st~~ Revised

CPUC Sheet No. 39
CPUC Sheet No. 39

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PRELIMINARY STATEMENT
(Continued)

12. SYMBOLS (Continued)

- (L) To signify material relocated from or to another part of tariff schedules with no change in text, rate, or rule or condition.
- (N) To signify new material including listing, rate, rule or condition.
- (R) To signify reduction.
- (T) To signify change in wording of text, but not change in rate, rule or condition.

13. MEMORANDUM ACCOUNTS

A. Catastrophic Event Memorandum Account (CEMA)

i. PURPOSE

The purpose of the Catastrophic Event Memorandum Account (CEMA) is to record all costs incurred by the Utility associated with a catastrophic event. The Utility will record the costs for the following in CEMA:

- 1. Restoring utility service to the Utility's Customers;
- 2. Repairing, replacing, or restoring damaged Utility facilities; and
- 3. Complying with governmental agency orders.

The authority to establish this account was granted in CPUC Resolution E-3238, dated July 24, 1991.

Per Ordering Paragraph 5 of D.19-07-015 the CEMA can be used to track associated costs for implementing customer protections for all disasters where the Customer of California or the President of the United States has declared a state of emergency. Each entries in the account shall be segregated by qualifying event.

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ii. PROCEDURE

- 1. A catastrophic event is defined as a disaster or state of emergency as declared by the appropriate federal or state authorities.
- 2. Should a catastrophic event occur, the Utility will inform the Commission by letter within 30 days after the event that the Utility has started accruing costs in the CEMA. The letter shall be mailed to the Director of the Commission Energy Division.

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Advice Letter No. 12428-E Michael R. Smart Date Filed July 15, 2013-September 9, 2019

Decision No. _____ Name President Effective July 15, 2013October 9, 2019

Title

Resolution No. _____

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
SOUTH LAKE TAHOE, CALIFORNIA

3rd~~2nd~~ Revised
_Canceling 2nd~~1st~~ Revised

CPUC Sheet No. 39
CPUC Sheet No. 39

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Advice Letter No. 12428-E Michael R. Smart Date Filed July 15, 2013 - September 9, 2019

Decision No. _____ Name President Effective July 15, 2013 - October 9, 2019

Title

Resolution No. _____

PRELIMINARY STATEMENT

(Continued)

13. MEMORANDUM ACCOUNTS (Continued)

A. Catastrophic Event Memorandum Account (CEMA) (Continued)

ii. PROCEDURE (Continued)

3. The letter shall specify the date, time and location of the catastrophic event. The letter shall also state which service areas are affected, the impact on the Utility's facilities, and give an estimate of the extraordinary costs expected to be incurred.
4. Entries to the CEMA shall be made at the end of each month commencing with the month in which the event occurs. The Utility shall record capital costs and expenses separately.
5. The Utility shall not record any capital costs or expenses incurred prior to the start of the declared disaster or state of emergency, as identified by the appropriate authorities.

iii. APPLICABILITY

The CEMA balance will be recovered from all customer classes, unless specifically requested for exclusion by the Utility.

iv. CHANGES IN RATES

Costs recorded in the CEMA may be recovered in rates only after a request by the Utility, a showing of reasonableness, and approval by the Commission. Such a request may be made by formal application specifically for that purpose, by inclusion in a subsequent general rate case, or other rate setting request.

Advice Letter No. 12412-E Gregory S. Sorensen Date Filed January 18~~September 9,~~
2019

Decision No. _____ President Effective July 31~~October 9,~~
2019

Title

Resolution No. _____

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
SOUTH LAKE TAHOE, CALIFORNIA

Canceling 3rd Revised CPUC Sheet No. 40
2nd Revised CPUC Sheet No. 40

(Continued)

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Advice Letter No. 12412-E Gregory S. Sorensen Date Filed January 18~~September 9,~~
2019

Decision No. _____ President Effective July 31~~October 9,~~
2019

Title

Resolution No. _____

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PRELIMINARY STATEMENT

(Continued)

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(Continued)

Advice Letter No. 124-E

Michael R. Smart

Date Filed September 9, 2019

Decision No. _____

Name
President
Title

Effective October 9, 2019

Resolution No. _____

PRELIMINARY STATEMENT
(Continued)

13. MEMORANDUM ACCOUNTS (Continued)

A. Catastrophic Event Memorandum Account (CEMA) (Continued)

ii. PROCEDURE (Continued)

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(Continued)

Advice Letter No. 124-E

Gregory S. Sorensen
Name

Date Filed September 9, 2019

Decision No. _____

President
Title

Effective October 9, 2019

Resolution No. _____