



# 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) #: 125-E

Tier Designation: Tier 3

Subject of AL: Liberty CalPeco requests to use its existing A-1 small commercial rate (with no demand charges) for the DCFCs that will be installed through the program authorized in D.18-09-034

Keywords (choose from CPUC listing): Transportation Electrification

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-09-034

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: N/A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: 9/13/19

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  
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: California  
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  
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September 13, 2019

**VIA EMAIL AND UPS**

**Advice Letter No. 125-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 CalPeco requests to use its existing A-1 small commercial rate (with no demand charges) for the DCFCs that will be installed through the program authorized in D.18-09-034.**

**I. Purpose**

Pursuant to Commission Decision (D.) 18-09-034, Liberty Utilities (CalPeco Electric) LLC (U 933 E) ("Liberty CalPeco") hereby submits this Tier 3 Advice Letter to propose using its small commercial customer rate (A-1 rate class), with no demand charges, as a temporary rate for select Direct Current Fast Charger ("DCFC") infrastructure. Only DCFC sites installed through Liberty CalPeco's Senate Bill ("SB") 350 transportation electrification ("TE") program will be eligible to utilize the temporary rate.

**II. Background**

In SB 350, the Clean Energy and Pollution Reduction Act (Chapter 547, Statutes of 2015), the California Legislature established new clean energy, clean air, and greenhouse gas reduction goals for California for 2030 and beyond. SB 350 requires the California Public Utilities Commission ("Commission"), in consultation with the California Air Resources Board and the California Energy Commission, to direct the utilities under the CPUC's regulatory oversight to undertake TE activities consistent with Public Utilities Code Sections 237.5 and 740.12.

This Advice Letter initiates the development of a rate structure that will incentivize efficient and cost-effective electric vehicle ("EV") charging in the Liberty CalPeco service territory. In order to bridge the gap between rates currently paid at eligible DCFC stations and the rates that will be developed in Liberty CalPeco's upcoming DCFC tariff application, Liberty CalPeco proposes this temporary rate structure be implemented.

### **III. Liberty CalPeco's Temporary Rate for Select DCFC Infrastructure**

Liberty CalPeco proposes to utilize its small commercial customer rate (A-1 rate class), with no demand charges, as a temporary rate for select DCFC infrastructure. This rate will be used on a temporary basis while a specific rate structure is developed to address time-of-use pricing to encourage EV charging when energy is at its lowest cost, and system peak demand is not an issue.

Liberty CalPeco will use this interim rate until the Commission approves the proposed rate design (or alternative design) in Liberty CalPeco's DCFC tariff application. Liberty CalPeco anticipates that at least two sites will use the interim rate as soon as November 2019, and seven additional sites will come online in 2020. Liberty CalPeco will track the kWh usage and load profile of these DCFC customers on the interim rate to help develop a permanent DCFC rate.

#### **Tier Designation**

Pursuant to General Order 96-B, Section 5, this Advice Letter is being submitted with a Tier 3 designation.

#### **Effective Date**

Liberty CalPeco requests that this Tier 3 Advice Letter become effective September 13, 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 October 3, 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)

Energy Division Tariff Unit  
California Public Utilities Commission  
September 13, 2019  
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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)

**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](mailto:Dan.Marsh@libertyutilities.com)

cc: Liberty CalPeco General Order 96-B Service List  
A.17-06-031, et al. 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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