



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) #: 127-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Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: N/A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 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

October 10, 2019

VIA EMAIL AND UPS

**Advice Letter No. 127-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, 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:

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

Energy Division Tariff Unit
California Public Utilities Commission
October 10, 2019
Page 5

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

gbinge@ktminc.com;
emello@sppc.com;
epoole@adplaw.com;
cem@newsdata.com;
rmccann@umich.edu;
sheila@wma.org;
abb@eslawfirm.com;
cbk@eslawfirm.com;
bhodgeusa@yahoo.com;
chilen@nvenergy.com;
phanschen@mofo.com;
liddell@energyattorney.com;
cem@newsdata.com;
dietrichlaw2@earthlink.net;
ericj@eslawfirm.com;
clerk-recorder@sierracounty.ws;
plumascoco@gmail.com;
marshall@psln.com;
stephenhollabaugh@tdpud.org;
gross@portersimon.com;
mccluretahoe@yahoo.com;
catherine.mazzeo@swgas.com;
Theresa.Faegre@libertyutilities.com;
SDG&ETariffs@semprautilities.com;
greg.campbell@libertyutilities.com;
bcragg@goodinmacbride.com;

AdviceTariffManager@sce.com;
edtariffunit@cpuc.ca.gov;
jrw@cpuc.ca.gov;
rmp@cpuc.ca.gov;
jaime.gannon@cpuc.ca.gov;
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;
Rob.Oglesby@energy.ca.gov;
stevegreenwald@dwt.com;
vidhyaprabhakaran@dwt.com;
judypau@dwt.com;
dwtcpucdockets@dwt.com;
patrickferguson@dwt.com;
travis.ritchie@sierraclub.org;
dan.marsh@libertyutilities.com;
sharon.yang@libertyutilities.com;
ginge@kinectenergy.com

Appendix 1 – Liberty CalPeco ESA Pilot Tables

| Table 1 - Multi-family Affordable Housing in Liberty CalPeco's Service Territory | | | | |
|---|---------------------|------------|-----------------------------|------------------------|
| Project Name | City | Zip | Affordable Units | Total Units |
| 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 |
| Total | | | 499 | 509 |

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

| Table 3 - Liberty Approved ESA Budgets PYs 2018-2020 | | | | |
|---|------------------|------------------|------------------|--------------------|
| Budget Categories | 2018 | 2019 | 2020 | Total |
| 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 |
| Subtotal Admin | \$159,925 | \$163,124 | \$166,386 | \$489,435 |
| Weatherization/ Measures | \$495,401 | \$505,309 | \$515,415 | \$1,516,125 |
| Measures (New in 2017) | \$0 | \$0 | \$0 | \$0 |
| NEW Multi Family Common Treatment | \$50,000 | \$51,000 | \$52,020 | \$153,020 |
| Energy Education | \$26,725 | \$27,260 | \$27,805 | \$81,790 |
| Subtotal Program | \$522,126 | \$532,569 | \$543,220 | \$1,597,915 |
| Total Program | \$732,051 | \$746,693 | \$761,626 | \$2,240,369 |