



# California Public Utilities Commission

# ADVICE LETTER



| ENERGY UIILIIY   | OF CALIF   |  |  |  |  |
|--|--|--|--|--|--|
| 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  | Contact Person: Dan Marsh Phone #: 562-299-5104 E-mail: Dan.Marsh@libertyutilities.com E-mail Disposition Notice to: |  |  |  |  |
| EXPLANATION OF UTILITY TYPE  ELC = Electric GAS = Gas WATER = Water  PLC = Pipeline HEAT = Heat WATER = Water  | (Date Submitted / Received Stamp by CPUC)  |  |  |  |  |
| Advice Letter (AL) #: 128-E-A  | Tier Designation: 2  |  |  |  |  |
| Subject of AL: 2020 PTAM Revision  Keywords (choose from CPUC listing): Increase I   | Rates  |  |  |  |  |
| AL Type:  Monthly Quarterly ✓ Annua  |  |  |  |  |  |
| If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-11-030  |  |  |  |  |  |
| Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: $_{ m No}$   |  |  |  |  |  |
| Summarize differences between the AL and the prior withdrawn or rejected AL:   |  |  |  |  |  |
| Confidential treatment requested? Yes V 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 V No  |  |  |  |  |  |
| Requested effective date: 11/5/19  | No. of tariff sheets: $_{ m 0}$  |  |  |  |  |
| Estimated system annual revenue effect (%): 1.5%   |  |  |  |  |  |
| Estimated system average rate effect (%): 1.5%   |  |  |  |  |  |
| 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: All residential, commercial, streetlight, and irrigation rate schedules   |  |  |  |  |  |
| Service affected and changes proposed <sup>1:</sup> Increase base rate revenue   |  |  |  |  |  |
| Pending advice letters that revise the same tariff sheets:   |  |  |  |  |  |

# 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

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                   |  |
| Curtailable 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 22, 2019

## **VIA EMAIL AND UPS**

Advice Letter No. 128-E-A (U 933-E)

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

## **Subject:** Amended 2020 Post-Test Year Adjustment Mechanism

Liberty Utilities (CalPeco Electric) LLC (U 933 E) ("Liberty CalPeco") hereby submits this amended **Tier 2** Advice Letter No. 128-E-A to increase its base rate revenues in accordance with the Post-Test Year Adjustment Mechanism ("PTAM") as set forth in Section 9 of the Preliminary Statement in the Liberty CalPeco Tariff.

# I. Purpose

The purpose of this amended filing is to adjust Liberty CalPeco's forecast to revise base rates as of January 1, 2020 pursuant to the PTAM tariff authorized in D.12-11-030. Liberty CalPeco's original Advice Letter No. 128-E utilized an incorrect authorized base rate revenue requirement in its calculation. The revised forecast contained in Table 1 utilizes the correct authorized base rate revenue requirement, which changes Liberty CalPeco's requested increase from \$818,741 to \$834,267.

# II. Coordination with Other Pending Liberty CalPeco Rate Proceedings

Liberty CalPeco currently has an Energy Cost Adjustment Clause ("ECAC") application (A.19-07-007) ("ECAC Application") pending before the Commission. Liberty CalPeco's tariff provides that revisions to the ECAC rates also become effective as of January 1, 2020.

Assuming a final decision is issued in Liberty CalPeco's ECAC application on a schedule that enables the revised rates to become effective as of January 1, 2020, Liberty CalPeco intends to timely make the necessary compliance submissions, including presenting revised tariffs to implement the rate changes and enable the new rates being requested in this PTAM Advice Letter and the ECAC application to become effective as of January 1, 2020.

In any event, even if a decision in the ECAC application is not issued in time to enable the revised rates to become effective as of January 1, 2020, Liberty CalPeco shall supplement this Advice

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Letter by submitting revised tariff sheets based on the rate changes to become effective as of January 1, 2020.

### III. Background

The Liberty CalPeco PTAM tariff authorizes Liberty CalPeco to request increases to its base rate revenues based on a forecast of the Consumer Price Index ("CPI"), minus 0.5% productivity factor. Based on S&P Global Market Intelligence's CPI Forecast for 2020 of 2.0%, less a productivity factor of 0.5%, the PTAM attrition adjustment for 2020 is 1.5%.

### IV. Rate Change

Application of the PTAM Attrition Factor for 2020 results in a proposed rate increase in base rate revenues of \$834,267, or 1.5%, as shown in Table 1.

Table 1

|                      | Authorized<br>Base Rate<br>Revenue | Percentage<br>Increase in<br>Base Rate<br>Revenue | PTAM<br>Increase<br>Base Rate<br>Revenue | Base Rate<br>Revenue<br>Requirement |
|----------------------|------------------------------------|---|--|-------------------------------------|
| Customer Class       | Requirement                        | Requirement                                       | Requirement                              | 1/1/20                              |
| Residential (D-1)    | 27,855,512                         | 1.50%   | 417,833                                  | 28,273,344                          |
| A-1                  | 11,026,109                         |   | 165,392                                  | 11,191,501                          |
| A-2                  | 4,987,197                          |   | 74,808                                   | 5,062,004                           |
| A-3                  | 11,443,877                         |   | 171,658                                  | 11,615,535                          |
| Irrigation           | 86,518                             |   | 1,298                                    | 87,816                              |
| Street/Highway Light | 73,564                             |   | 1,103                                    | 74,668                              |
| Outdoor              | 145,051                            |   | 2,176                                    | 147,227                             |
|                      | 55,617,828                         |   | 834,267                                  | 56,452,095                          |

#### **Effective Date**

Liberty CalPeco requests that this **Tier 2** Advice Letter be effective as of November 5, 2019. Approval as of this date will enable Liberty CalPeco to submit the necessary Tier 1 Advice Letter containing the revised tariff sheets to be effective as of January 1, 2020 with the approved rate changes associated with this PTAM Advice Letter, the ECAC application, and any other Commission-approved rate changes.

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#### **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 November 5, 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

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: 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

cc: Liberty CalPeco General Order 96-B Service List

Energy Division Tariff Unit California Public Utilities Commission October 22, 2019 Page 4

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; erici@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; kil@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