



Liberty Utilities (CalPeco Electric) LLC
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March 24, 2020

VIA EMAIL ONLY

**Advice Letter 139-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) – Implementation of
Emergency Disaster Relief Program for COVID-19**

Purpose

In accordance with Ordering Paragraph (“OP”) 1 of California Public Utilities Commission (“Commission”) Decision (“D.”) 19-07-015, and the Commission Executive Director’s March 17, 2020 letter addressing Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency, Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty CalPeco”) hereby submits this Tier 1 Advice Letter to notify the Commission that Liberty CalPeco is implementing applicable portions of its Emergency Disaster Relief Program (“EDRP”) for customers impacted by the COVID-19 pandemic.

Background

On March 4, 2020, Governor Gavin Newsom declared a State of Emergency¹ in California as part of the state’s response to address the global outbreak of COVID-19. On March 16, 2020, Governor Newsom issued Executive Order N-28-20,² requesting that the Commission monitor the measures by public and private utility providers to implement customer service protections in response to COVID-19. On March 17, 2020, Commission Executive Director Alice Stebbins directed utilities to submit advice letters implementing the applicable EDRP customer protections set forth in D.19-07-015 and to apply such protections retroactively to March 4, 2020, when the State of Emergency was declared.

Liberty CalPeco recognizes that the services it provides are critical. While the impacts of COVID-19 are evolving quickly, some customers may experience financial difficulty. As an initial response, on March 15, 2020, Liberty CalPeco temporarily suspended service disconnections across its service territory. Two days later, the Commission Executive Director instructed utilities to extend the “applicable customer protections directed in D.19-07-015” to customers in response to the COVID-

¹ Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

² Available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf>.

19 pandemic. Pursuant to this letter, Liberty CalPeco is implementing the applicable customer protections contained in D.19-07-015 for customers impacted by the emergency. As noted in the Commission Executive Director's letter, this emergency has not resulted in disruptions or degradations to utility service, and it is expected that utility services will remain reliable and assist in California's COVID-19 response by allowing more people to safely self-quarantine or work from home. Some of the protections included in D.19-07-015 are not applicable to the current situation.

Eligibility Requirements and Time Limits for Customer Protections

The consumer protections described under the following sections of this letter will be offered to all Liberty CalPeco residential and small business customers in its service territory affected by the COVID-19 emergency.

Liberty CalPeco is committed to implementing these customer protections for up to one year, retroactive to March 4, 2020, which is consistent with the direction provided in D.19-07-015 that customer protections shall conclude no sooner than 12 months from the date of the original emergency declaration, or as appropriately determined by the Governor's Office of Emergency Services.

Liberty CalPeco will continue to carefully monitor the situation. If any adjustments to the customer protections or time limit are merited, Liberty CalPeco will notify the Commission via a Tier 1 advice to any changes to its customer protection measures.

Adopted Customer Protections

Liberty CalPeco is implementing the following EDRP customer protections identified in D.19-07-015. These protections will be applied retroactively to March 4, 2020, and will be made available to all customers affected by COVID-19:

1. Implement payment plan options for residential customers;
2. Suspend disconnection for non-payment and associated fees;
3. Waive deposit and late fee requirements;
4. Suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections; and
5. Discontinue generating all recertification and verification requests that require customers to provide their current income information.

Liberty CalPeco will not implement other customer protections included in D.19-07-015, such as discontinued billing, expedited move-in and move-out service requests, and suspension of estimated bills, because these customer protections are not applicable to this specific emergency. Consistent with D.19-07-015, these customer protections were designed for customers impacted by disasters that require relocation from damaged structures or include disruption or degradation of electric service related to the disaster. These circumstances do not exist in this situation.

Customer Communication Plan

Liberty CalPeco is implementing the following procedures to notify customers and local government representatives on the customer protections outlined in its EDRP:

1. Targeted Outreach to Impacted Customers – Liberty CalPeco has begun notifying impacted customers by mail in the five languages as outlined in its policy and on its website (Under Emergencies & Outages > Emergency Disaster Relief).
2. Local Government Representatives – Liberty CalPeco has started notifying local government and/or elected officials by email that the EDRP is in effect.
3. Outbound Dialing – Within 72 hours of the conclusion of this event, Liberty CalPeco will place calls throughout its territory regarding emergency relief customer protections.
4. Customer Contact Center – Liberty CalPeco has provided its 24-hour emergency representatives with information related to the EDRP.

Participating in or developing community outreach centers is inconsistent with Executive Order N-33-20 to stay home, and therefore Liberty CalPeco does not plan to implement these.

Protecting the Health and Safety of our Employees and Customers

In addition to the customer protection measures and customer outreach plan described above, Liberty CalPeco has implemented the following protective measures to safeguard the health and safety of its employees and customers:

- Liberty CalPeco has a pandemic preparedness plan in place and established a task force that is working with guidance from the Centers for Disease Control and Prevention (“CDC”). This task force has spent several weeks preparing for how the virus might impact the organization and communities served and how to respond appropriately.
- Liberty CalPeco continues to monitor the situation and actively shares updates and information with employees (weekly or more often as needed), so they can keep themselves, their families, and their community safe.
- Liberty CalPeco has deployed social distancing policies, identified key staff, and separated them. Liberty CalPeco has instituted a remote workplace separation program for those business functions for which this is practicable.
- Liberty CalPeco has implemented deep cleaning of offices by a third-party disinfection service.
- Liberty CalPeco has provided customer service representatives and field personnel with gloves and additional protective supplies and requires social distancing of at least six feet for interactions with customers.
- Liberty CalPeco has limited employee travel, suspended in-person meetings, and postponed larger gatherings and events.
- Liberty CalPeco requires employees to follow the CDC recommendations on personal safety, such as frequent hand washing and distancing from others who are sick.
- Liberty CalPeco requires employees who feel sick or have concerns regarding potential exposure to stay at home.

Catastrophic Event Memorandum Account

Pursuant to Ordering Paragraph 5 of D.19-07-015, Liberty CalPeco shall track the incremental costs related to this state of emergency and the implementation of its customer protections in its Catastrophic Event Memorandum Account (“CEMA”). Costs related to COVID-19 will include, but are not limited to, customer outreach, loss of revenue for uncollected bills, and the suspension of late fees.

Effective Date

Pursuant to the letter of Executive Director Stebbins, Liberty CalPeco requests that this Tier 1 Advice Letter be effective March 4, 2020.

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 April 13, 2020, 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 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 and Service

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 G.O. 96-B service list. A copy is also being sent to parties on the A.18-03-011 service list. During the COVID-19 pandemic, Liberty CalPeco can only provide electronic copies of this advice letter to the service list.

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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
Email: Dan.Marsh@libertyutilities.com

cc: Liberty CalPeco Advice Letter Service List
Service List of R.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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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 #: 562-805-2083

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) #: 139-E

Tier Designation: 1

Subject of AL: Implementation of Emergency Disaster Relief Program for COVID-19.

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: 3/4/20

No. of tariff sheets: 0

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: 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: 562-805-2083
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	