



Liberty Utilities (CalPeco Electric) LLC
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February 21, 2024

VIA EMAIL ONLY

EDTariffUnit@cpuc.ca.gov

**Advice Letter 232-E
(U 933-E)**

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

Subject: California Alternate Rates for Energy (CARE) Outreach Plan to Attain 90 Percent Enrollment

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.”) 21-10-023, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 1 advice letter to provide information on outreach efforts to meet the Commission requirements of 90 percent CARE enrollment.

Purpose

Pursuant to Ordering Paragraph (“OP”) 8 of D.21-10-023, Liberty submits this Tier 1 advice letter providing information regarding outreach and meeting the 90 percent CARE enrollment goal.

Background

In D.08-12-019, the Commission established a CARE enrollment goal of 90 percent of all eligible SMJU customers.¹ On November 7, 2019, D.19-11-005 reopened the Small and Multi-jurisdictional Utilities (“SMJU”) applications for approval of low-income programs and budgets and provided guidance to the SMJUs regarding program design and implementation. On October 21, 2021, D.21-10-023 ordered any SMJU to file a Tier 1 advice letter no later than February 21, 2024, if it fails to meet the 90 percent enrollment goal by December 31, 2023.²

Discussion

As of December 31, 2023, Liberty’s CARE enrollment was at 76.5 percent, a significant increase from its 66 percent enrollment on December 31, 2022. While still below the 90 percent goal, Liberty has a similar enrollment penetration as the Joint Investor-Owned Utilities (“IOUs”) have in the same rural counties.

¹ D.21-10-023 at page 11.

² D.21-10-023 at page 160.

On June 15, 2023, Pacific Gas and Electric (“PG&E”), Southern California Edison (“SCE”), San Diego Gas and Electric (SDG&E), and Southern California Gas (“SoCalGas”) presented their low-income programs highlights and results to the Low-Income Oversight Board (“LIOB”) in a public meeting. In the presentation, the IOUs highlighted the counties with the lowest enrollment rates as of April 30, 2023, including four counties that overlap with Liberty’s service territory.³ In Plumas, Nevada, and Placer Counties, PGE had enrollment of 61 percent, 75 percent, and 77 percent, respectively. In Mono County, SCE had enrollment of 37 percent of the estimated eligible CARE customers.

In this advice letter, Liberty provides information on the cost of various outreach strategies implemented in the first three years of the program cycle, Liberty’s most cost-effective strategies for increasing CARE enrollment, and proposed outreach adjustments for the remaining program cycle based on the evaluation of previous outreach strategies.⁴

Estimated Eligibility

Liberty relies on data from the Athens CARE eligibility study to determine estimated eligibility and enrollment rates for low-income customers. In 2023, Liberty had 18,442 permanent residential customers, and 27.67 percent of those were estimated to be eligible for CARE. As of the end of December 2023, Liberty had 76.5 percent of the estimated 5,102 eligible households enrolled in CARE. Eligibility is determined by households with incomes estimated at or below 200 percent of the Federal Poverty Level (“FPL”) and households also are eligible categorically for CARE if they receive assistance from other qualified public assistance programs. Liberty includes both options for enrollment in its CARE applications. A comparison of CARE customers enrolled by county for 2022 and 2023, shown in the table, shows that Liberty has increased its penetration in all seven counties it serves.

County	2022 Penetration Rate	2023 Penetration Rate
Alpine	77%	90%
El Dorado	69%	82%
Mono	58%	65%
Nevada	55%	69%
Placer	51%	60%
Plumas	76%	76%
Sierra	79%	82%

Outreach Costs 2021-2023

The following tables show administrative and outreach costs for 2021-2023.

³ Joint IOUs Report of the CARE, FERA and ESA Programs to the LIOB June 15, 2023, at slides 11-12.

⁴ D.21-10-023, OP 8.

2021 CARE Administrative Costs

CARE Program Administrative Costs Categories	2021
Outreach	Expenditures
Capitation Fees	\$ -
Applications	\$ 17,314.58
Consulting	\$ 28,328.61
USPS	\$ 2,500.00
Marketing	\$ 17,267.16
Sub-total	\$ 65,410.35
General	
Processing, Certification, and Verification	\$ 54,544.20
Consulting	\$ 7,215.00
Regulatory Compliance	\$ 6,240.00
Travel	\$ -
Sub-total	\$ 67,999.20
Total	\$ 133,409.55

2022 CARE Administrative Costs

CARE Program Administrative Costs Categories	2022
Outreach	Expenditures
Labor	\$ 42,029.94
Capitation Fees	\$ -
Applications	\$ 17,966.40
Consulting	\$ 8,936.69
USPS	\$ 265.00
Marketing	\$ 24,951.27
Sub-total	\$ 94,149.30
General	Expenditures
Labor	\$ 31,209.28
Processing, Certification, and Verification	\$ 6,796.37
Consulting	\$ 11,115.00
Regulatory Compliance	\$ 6,240.00
Travel	\$ -
Sub-total	\$ 55,360.65
Total	\$ 149,509.95

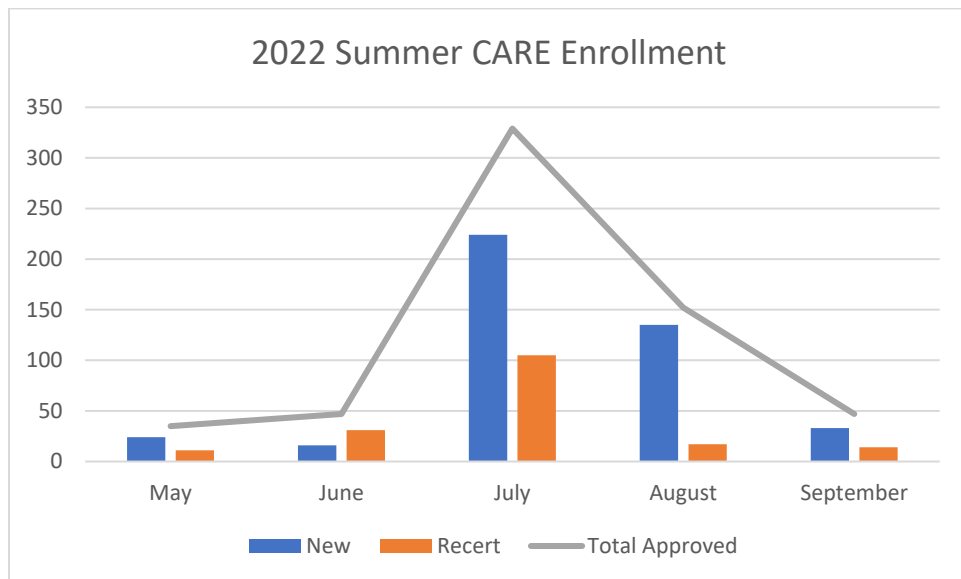
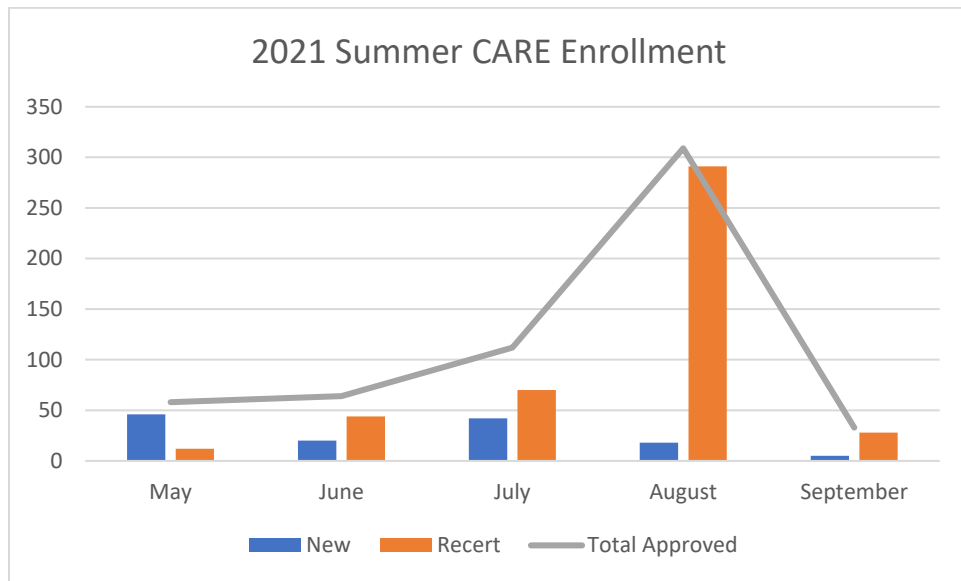
CARE Program Administrative Costs Categories	2023
Outreach	Expenditures
Labor	\$ 8,280.71
Capitation Fees	\$ -
Applications	\$ 12,852.83
Consulting	\$ 26,940.28
USPS	\$ 3,290.00
Marketing	\$ 12,067.00
Sub-total	\$ 63,430.82
General	Expenditures
Labor	\$ 61,632.89
Processing, Certification, and Verification	332
Consulting	\$ 4,615.00
Regulatory Compliance	\$ 1,560.00
Travel	\$ -
Sub-total	\$ 68,139.89
Total	\$ 131,570.71

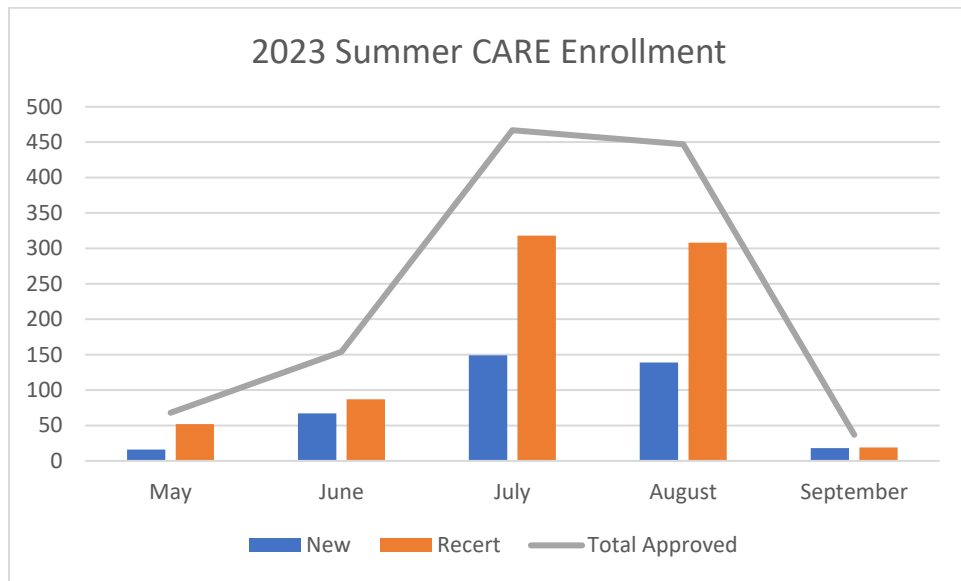
Outreach Cost Effectiveness

Liberty has three broad categories of outreach: Media Campaigns, Outreach Coordinator, and Leveraging. Liberty's media campaign for CARE is designed to increase awareness of the program and its benefits, provide additional information via click-through options to program webpages with digital ads, provide program information via print and radio ads, and overall supports other outreach efforts. Liberty's marketing expenses for program years 2021-2023 compared to total new enrollments and average marketing spend per new participant are shown below:

	2021	2022	2023
Marketing Costs	\$ 17,267	\$ 24,951	\$ 12,067
New Participants	679	794	577
Average Marketing Spend per New CARE Participant	\$ 25.43	\$ 31.42	\$ 20.91

Liberty's outreach coordinator organizes and attends events throughout the year to promote the CARE program and other public purpose programs at Liberty. The outreach coordinator is bilingual and can enroll CARE customers in-person via Liberty's online application process. In addition to events, the outreach coordinator contacts customers directly by phone and/or email to notify of recertification requirements and sends bill insert applications when the annual updates are made to income eligibility each June. The effectiveness of this outreach is illustrated by the July and August enrollment spikes in the following charts:





The table below shows event outreach efforts for program year 2023.

2023 Outreach Events			
Date	Event	Location	County
21-Apr	Earth Day	North Lake Tahoe	Placer
24-Apr	Earth Day	South Lake Tahoe	El Dorado
9-May	Timberfest	Loyalton	Sierra
25-May	Senior Resource Fair	North Lake Tahoe	Placer
5-Jun	El Dorado Behavioral Health	South Lake Tahoe	El Dorado
24-Jun	Tahoe Truckee Air Show	Truckee	Nevada
27-Jun	Community Hub Library	South Lake Tahoe	El Dorado
26-Aug	Eastern Plumas Healthcare	Portola	Plumas
13-Sep	Multicultural Event	South Lake Tahoe	El Dorado
16-Sep	Markleeville Farmers Market	Markleeville	Alpine
28-Sep	Vaccine Clinic Sierra Community House	Kings Beach	Placer
20-Oct	Barton Health Expo	South Lake Tahoe	El Dorado
16-Nov	Washoe Tribe Outreach Hung A Lei Ti	Woodfords	Alpine

Liberty leverages other assistance programs to increase awareness of the CARE discount. Energy Savings Assistance (“ESA”), Low Income Home Energy Assistance Program (“LIHEAP”), Medical Baseline Allowance (“MBL”), and Solar on Multi-family Affordable Housing (“SOMAH”) are all programs that offer opportunities for engaging new and existing CARE customers. Coordinating with community-based organizations (“CBOs”) is another way Liberty leverages outreach efforts. Liberty convenes regular meetings with CBOs and ESA contractors in

its service territory to discuss CARE, ESA, and other Access and Functional Needs (“AFN”) assistance programs.

Outreach Proposed Strategies 2024-2026

Liberty plans to implement new strategies and adjusting some marketing tactics for enrolling potentially eligible customers in CARE. Offering welcome packages to new customers with information regarding financial assistance programs and using Geographic Information System (“GIS”) data to identify areas in the service territory with non-CARE households that may be eligible are two strategies Liberty intends on exploring in 2024. Liberty plans to expand its marketing tactic of using QR codes on marketing materials to help direct eligible customers to the online enrollment form. Targeted outreach is another option Liberty can expand upon to increase awareness of the CARE program.

In conjunction with the GIS analysis, Liberty can directly reach out to underserved areas and directly market to those customers. Geofencing opportunities in media campaigns are being explored, as well as data matching with other local utilities. Liberty is also planning events to coordinate with local agencies, CBOs, and utilities to provide a “one stop shop” for enrollment in available assistance programs. The first partnership event was held on Thursday February 15, 2024. It was a great success, with 97 attendees, and 23 CARE applications received.

Conclusion

Liberty continues to learn from its outreach efforts and program results. Through collaboration with CBOs and other local agencies, Liberty is working to continue its progress and reach its 90 percent CARE enrollment goal.

Tier Designation

Pursuant to General Order (“GO”) 96-B, and D.21-10-023, OP 8, this advice letter is submitted with a Tier 1 designation.

Effective Date

Liberty requests an effective date of February 21, 2024.

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 March 12, 2024, 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:

Liberty Utilities (CalPeco Electric) LLC
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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 to Liberty 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
Email: CaseAdmin@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. Address change requests to Liberty's GO 96-B service list should be directed by electronic mail to:
AnnMarie.Sanchez@LibertyUtilities.com.

For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at ProcessOffice@cpuc.ca.gov.

If additional information is required, please do not hesitate to contact me at
Dan.Marsh@libertyutilities.com

Respectfully submitted,

LIBERTY

/s/ Dan Marsh
Dan Marsh
Senior Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List
A.20-03-014 Service List

VIA EMAIL

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California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: A2003014 - WEST COAST GAS COMPA
FILER: WEST COAST GAS COMPANY INC.
LIST NAME: LIST
LAST CHANGED: OCTOBER 9, 2023

[Download the Comma-delimited File](#)
[About Comma-delimited Files](#)

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AREA	AREA
505 VAN NESS AVENUE	505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214	SAN FRANCISCO, CA 94102-3214

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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: Dan Marsh

Phone #: 530-721-2435

E-mail: Dan.Marsh@libertyutilities.com

E-mail Disposition Notice to: Annmarie.Sanchez@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) #: 232-E

Tier Designation: 1

Subject of AL: California Alternate Rates for Energy (CARE) Outreach Plan

Keywords (choose from CPUC listing): CARE

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-10-023

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

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: 2/21/24

No. of tariff sheets:

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:

Pending advice letters that revise the same tariff sheets:

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

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Clear Form

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	