



Liberty Utilities (CalPeco Electric) LLC  
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May 8, 2025

**VIA EMAIL ONLY**  
**EDTariffUnit@cpuc.ca.gov**

**Advice Letter 248-E-A**

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

**Subject: Liberty's Residential Income-Graduated Fixed Charge Implementation Proposal, Pursuant to Decision 24-05-028**

**Purpose**

Pursuant to Ordering Paragraph ("OP") 10 of Commission Decision 24-05-028 (the "Decision"), Liberty Utilities (CalPeco Electric) LLC (U 933 E) (the "Company") submitted a Tier 3 Advice Letter (AL-248) to propose an implementation plan of the Residential Income-Graduated Fixed Charge ("IGFC"). The purpose of this supplemental advice letter is to revise the fixed charge amount proposed in AL-248, and to provide additional detail on Liberty's marketing, education and outreach ("ME&O") budget and messaging on Tier 1 customer enrollment.

**Background**

The Commission issued the Decision as part of Rulemaking ("R.") 22-07-005 (Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates). The Decision directs Liberty and other electric investor-owned utilities ("IOUs") to change the structure of residential customer bills in accordance with California Assembly Bill (AB) 205, Stats. 2022, Ch. 61.

OP 10 of the Decision orders that within 120 days of its issuance (e.g., September 12, 2024), Liberty must "file a Tier 3 advice letter to implement income-graduated fixed charges, propose a marketing, education, and outreach plan, propose a line-item budget for implementation costs, and provide a justification for each proposed line-item cost."<sup>1</sup>

The Decision further specifies that Liberty shall include the following information in the Tier 3 advice letter:

1. A list of all base revenue cost categories that the utility proposes to recover through its income-graduated fixed charges and the revenue requirement associated with each cost category;
2. An explanation of why each listed base revenue cost category is a fixed cost similar to a category approved for recovery through this decision;

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<sup>1</sup> D. 24-05-028, Order at 164-165.

3. The revenue requirement for each of the fixed cost categories approved in this decision, if applicable to the utility;
4. An explanation of how each base revenue cost category was converted from the current volumetric rate to a new per customer rate, if it is incremental to the current fixed charges;
5. Proposed fixed charge levels; and
6. A bill impact analysis demonstrating that both Tier 1 and Tier 2 customers with average electricity usage in each baseline territory will realize a bill savings compared to currently effective rates.

### **Income-Graduated Fixed Charges (“IGFC”)**

The Company proposes to recover through its IGFC marginal customer access costs. Marginal customer access costs are costs associated with providing customers access to the electric grid (e.g., meters, services, and a portion of distribution plant related to providing customers access to the electric grid) and basic customer services (e.g., meter reading, billing, and customer care). In addition, IGFC charges recover wildfire costs, which are also considered marginal customer costs. Marginal customer access costs vary with the number of customers served.

In AL-248-E the Company provided a customer cost analysis to determine the customer cost per customer which supported a fixed cost level higher than the fixed charge amount calculated in D. 24-05-028, and the Company therefore proposed a base service charge of \$39.95. However, based on feedback, Liberty revises the proposed fixed charge amount to \$31.70 as provided in the settlement approved in D.24-05-028.

Pursuant to OP 10 of D.24-05-028, the Company provides the following responses to information the Company is required to address in this filing.

1. Base revenue cost categories that the utility proposes to recover through its income-graduated fixed charges and the revenue requirement associated with each cost category.
  - a. Please refer to Attachment 2. Attachment 2 provides a list of base rate cost categories and associated revenue requirement that were classified as customer and included in the IGFC. As depicted in Attachment 2, 58.29% of the Company’s revenue requirement was classified as customer and included in the IGFC.
2. An explanation of why each listed base revenue cost category is a fixed cost similar to a category approved for recovery through this decision.
  - a. Please refer to Attachment 2. In general, those costs that vary with the number of customers were classified as customer and included in the IGFC. Costs classified as customer include providing customers access to the electric grid (e.g., meters, services, and a portion of distribution plant associated with providing customers

- access to the electric grid), providing basic customer services (e.g., meter reading, billing, and customer care, and wildfire mitigation costs.
3. The revenue requirement for each of the fixed cost categories approved in this decision, if applicable to the utility.
    - a. Please refer to Attachment 2, and the Company's response to requirement 2 (above).
  4. An explanation of how each base revenue cost category was converted from the current volumetric rate to a new per customer rate, if it is incremental to the current fixed charges.
    - a. The Company proposes in its IGFC petition residential customer charges of \$31.70 per month for non-CARE customers, \$10.00 per month for Tier 1 CARE customers, and \$5.00 per month for Tier 2 CARE customers. The non-CARE customer charge Liberty calculated was reduced by 50 percent. The proposed customer charges recover in aggregate a higher portion of the Company's authorized base rate revenue requirement than the authorized customer charges, as shown in Figures 1 and 2 (below). Specifically, Figure 1 shows the IGFC rate design increases fixed charge revenues for the residential permanent rate class by \$2.8 million, while reducing usage charge revenues by the same amount. Figure 2 shows the IGFC rate design increases fixed charge revenues for the residential non-permanent rate class by \$5.7 million, while reducing usage charge revenues by the same amount.
    - b. To achieve a revenue neutral rate design, the Company reduced its usage charges by 15.00 % for residential permanent customers and 23.00 % for residential non-permanent customers, as shown respectively in Figures 1 and 2 (below).

**Figure 1: IGFC Rate Design (Residential Permanent)**

| Residential Permanent | 2024 Authorized |            | IGFC |            | Change         | Change |
|-----------------------|-----------------|------------|------|------------|----------------|--------|
| Fixed Charge Rev      | \$              | 2,810,435  | \$   | 5,629,968  | \$ 2,819,533   | 100%   |
| Usage Charge Rev      | \$              | 18,581,080 | \$   | 15,761,546 | \$ (2,819,533) | -15%   |
| Total Base Rev        | \$              | 21,391,515 | \$   | 21,391,515 | \$ -           | 0%     |

**Figure 2: IGFC Rate Design (Residential Non-Permanent)**

| Residential Non-Permanent | 2024 Authorized |            | IGFC |            | Change         | Change |
|---------------------------|-----------------|------------|------|------------|----------------|--------|
| Fixed Charge Rev          | \$              | 4,411,800  | \$   | 10,111,208 | \$ 5,699,408   | 129%   |
| Usage Charge Rev          | \$              | 25,292,250 | \$   | 19,592,842 | \$ (5,699,408) | -23%   |
| Total Base Rev            | \$              | 29,704,050 | \$   | 29,704,050 | \$ -           | 0%     |

5. Proposed fixed charge levels.

- a. The Company's customer cost analysis shows a higher customer cost of \$79.90 per customer than the Company's proposed residential customer charges in its IGFC petition of \$31.70 per month for non-CARE customers, \$10.00 per month for Tier 1 CARE customers, and \$5.00 per month for Tier 2 CARE customers.

6. A bill impact analysis demonstrating that both Tier 1 and Tier 2 customers with average electricity usage in each baseline territory without changes to usage will realize a bill savings compared to currently effective rates.

- a. Customer bill impacts for non-CARE, Tier 1 CARE, and Tier 2 CARE customers are shown, respectively, in Figures 3, 4, and 5 (below). Figures 4 and 5 show that Tier 1 and Tier 2 CARE customers will realize a bill savings under the IGFC rate design as compared to the Company's GRC rate design.

**Figure 3: Customer Bill Impacts (Non-CARE)**

| Bill Impact Analysis | Monthly Usage (kWh) | IGFC Bill \$ | Current Bill \$ | Increase / (Decrease) \$ | Increase / (Decrease) % |
|----------------------|---------------------|--------------|-----------------|--------------------------|-------------------------|
| <b>Total Rates</b>   |                     |              |                 |                          |                         |
| <b>Winter Season</b> |                     |              |                 |                          |                         |
| 50% Below Avg. Usage | 357.2               | \$ 134.52    | \$ 124.01       | \$ 10.51                 | 8.5%                    |
| 25% Below Avg. Usage | 535.8               | \$ 185.93    | \$ 179.10       | \$ 6.83                  | 3.8%                    |
| Average Usage        | 714.4               | \$ 242.40    | \$ 239.76       | \$ 2.64                  | 1.1%                    |
| 25% Above Avg. Usage | 893.0               | \$ 300.43    | \$ 302.14       | \$ (1.71)                | -0.6%                   |
| 50% Above Avg. Usage | 1071.6              | \$ 358.47    | \$ 364.52       | \$ (6.05)                | -1.7%                   |
| <b>Summer Season</b> |                     |              |                 |                          |                         |
| 50% Below Avg. Usage | 263.6               | \$ 107.56    | \$ 95.13        | \$ 12.44                 | 13.1%                   |
| 25% Below Avg. Usage | 395.3               | \$ 145.50    | \$ 135.77       | \$ 9.72                  | 7.2%                    |
| Average Usage        | 527.1               | \$ 186.62    | \$ 179.93       | \$ 6.69                  | 3.7%                    |
| 25% Above Avg. Usage | 658.9               | \$ 229.44    | \$ 225.96       | \$ 3.48                  | 1.5%                    |
| 50% Above Avg. Usage | 790.7               | \$ 272.25    | \$ 271.98       | \$ 0.27                  | 0.1%                    |

**Figure 4: Customer Bill Impacts (Tier 1 CARE)**

| Bill Impact Analysis<br>Total Rates | Monthly<br>Usage (kWh) | IGFC<br>Bill \$ | Current<br>Bill \$ | Increase /<br>(Decrease) \$ | Increase /<br>(Decrease) % |
|-------------------------------------|------------------------|-----------------|--------------------|-----------------------------|----------------------------|
| <b>Winter Season</b>                |                        |                 |                    |                             |                            |
| 50% Below Avg. Usage                | 307.5                  | \$ 86.54        | \$ 91.90           | \$ (5.36)                   | -5.8%                      |
| 25% Below Avg. Usage                | 461.3                  | \$ 124.81       | \$ 132.32          | \$ (7.51)                   | -5.7%                      |
| Average Usage                       | 615.0                  | \$ 164.08       | \$ 173.81          | \$ (9.73)                   | -5.6%                      |
| 25% Above Avg. Usage                | 768.8                  | \$ 206.47       | \$ 218.64          | \$ (12.17)                  | -5.6%                      |
| 50% Above Avg. Usage                | 922.5                  | \$ 248.86       | \$ 263.47          | \$ (14.61)                  | -5.5%                      |
| <b>Summer Season</b>                |                        |                 |                    |                             |                            |
| 50% Below Avg. Usage                | 225.0                  | \$ 66.01        | \$ 70.22           | \$ (4.21)                   | -6.0%                      |
| 25% Below Avg. Usage                | 337.5                  | \$ 94.01        | \$ 99.79           | \$ (5.78)                   | -5.8%                      |
| Average Usage                       | 450.0                  | \$ 122.25       | \$ 129.62          | \$ (7.37)                   | -5.7%                      |
| 25% Above Avg. Usage                | 562.5                  | \$ 153.27       | \$ 162.43          | \$ (9.16)                   | -5.6%                      |
| 50% Above Avg. Usage                | 675.0                  | \$ 184.29       | \$ 195.23          | \$ (10.94)                  | -5.6%                      |

**Figure 5: Customer Bill Impacts (Tier 2 CARE)**

| Bill Impact Analysis<br>Total Rates | Monthly<br>Usage (kWh) | IGFC<br>Bill \$ | Current<br>Bill \$ | Increase /<br>(Decrease) \$ | Increase /<br>(Decrease) % |
|-------------------------------------|------------------------|-----------------|--------------------|-----------------------------|----------------------------|
| <b>Winter Season</b>                |                        |                 |                    |                             |                            |
| 50% Below Avg. Usage                | 307.5                  | \$ 81.54        | \$ 91.90           | \$ (10.36)                  | -11.3%                     |
| 25% Below Avg. Usage                | 461.3                  | \$ 119.81       | \$ 132.32          | \$ (12.51)                  | -9.5%                      |
| Average Usage                       | 615.0                  | \$ 159.08       | \$ 173.81          | \$ (14.73)                  | -8.5%                      |
| 25% Above Avg. Usage                | 768.8                  | \$ 201.47       | \$ 218.64          | \$ (17.17)                  | -7.9%                      |
| 50% Above Avg. Usage                | 922.5                  | \$ 243.86       | \$ 263.47          | \$ (19.61)                  | -7.4%                      |
| <b>Summer Season</b>                |                        |                 |                    |                             |                            |
| 50% Below Avg. Usage                | 225.0                  | \$ 61.01        | \$ 70.22           | \$ (9.21)                   | -13.1%                     |
| 25% Below Avg. Usage                | 337.5                  | \$ 89.01        | \$ 99.79           | \$ (10.78)                  | -10.8%                     |
| Average Usage                       | 450.0                  | \$ 117.25       | \$ 129.62          | \$ (12.37)                  | -9.5%                      |
| 25% Above Avg. Usage                | 562.5                  | \$ 148.27       | \$ 162.43          | \$ (14.16)                  | -8.7%                      |
| 50% Above Avg. Usage                | 675.0                  | \$ 179.29       | \$ 195.23          | \$ (15.94)                  | -8.2%                      |

**Marketing, Education and Outreach (“ME&O”) Plan**

The Decision requires the Company to:

- Develop a marketing, education, and outreach plan.
- Participate in the large utilities’ marketing, education, and outreach workshop to discuss the large utilities’ plans, research findings, and messaging.

- Consult with PacifiCorp to understand how the company systematically differentiates between single- and multi-family housing customers.

Liberty has leveraged these discussions, as well as the ME&O plans filed by the large utilities, Pacific Gas and Electric Company ("PG&E"), Southern California Edison Company ("SCE"), and San Diego Gas & Electric Company ("SDG&E"), to develop an implementation plan proposal.

The objectives of Liberty's ME&O plan are: awareness, understanding, and support among customers. Liberty's planned approach may include the following aspects of implementation. The planned approach may be adjusted as Liberty learns more throughout the implementation process. The estimated budget for Liberty's proposed ME&O plan is summarized in Table 1 below.

Phase 1 – Awareness: Informs customers about "what" the fixed charge is, "why" it is being implemented, and "when" it will take effect. Customers will receive information on timing and bill impacts, including the fixed charge amounts. These materials will emphasize the availability of additional resources to help customers understand how their bills will change and the resulting impacts. In addition, these materials will include resources for low-income and CARE customers.

- 1) Website: Publish and maintain IGFC web copy outlining details about the Company's upcoming implementation of the fixed charge, including information specific to CARE customers and what CARE customers need to do to qualify for lower income fixed charges (Tier 1).
- 2) Bill insert/mail: Provide targeted, direct communication to certain customers that highlights bill impacts. This direct email and mail communication will include a hypothetical example of an average customer's fixed charge amount, the estimated reduced volumetric usage charge, and a bill comparison estimating the impact on the bill. These communications will reference the website for additional information and resources, as well as resources for CARE customers.
- 3) Customer email: Send customer emails reinforcing the messaging described in (2) above.
- 4) Targeting mailings to CARE customers: These mailings will include additional explanation to reassure customers that their program participation benefits will not be impacted. It will also provide CARE customers with information on how to apply for lower income fixed charges (Tier 1).
- 5) Toolkits: Distribute IGFC educational pamphlets, flyers, and checklists in accessible formats.
- 6) Social media: Post content to Facebook and Twitter notifying customers of Liberty's fixed charge implementation with links to resources.
- 7) Paid advertisements: Digital and print advertisements in local publications discuss the "what," "why" and "when" for additional customer awareness.

Phase 2 – Implementation: Prepare employees to support customers throughout implementation of the fixed charge and provides continued support and resources to customers throughout the transition.

- 8) Employee Education: Prepare customer service and field operations employees with talking points and FAQs to answer customer questions, including information specific to CARE customers. Internal customer-facing groups may be leveraged to help drive early education about the fixed charge for utility employees, especially those whose work is customer-facing. Customer-facing groups may include the customer contact centers, payment locations and branch offices, field service teams, and credit and collections groups. Employees may be engaged through internal channels, including internal events, emails, and internal online resources.
- 9) Website: Publish and maintain IGFC web copy outlining details about the Company's upcoming implementation of the fixed charge, including information specific to CARE customers and what CARE customers need to do to qualify for lower income fixed charges (Tier 1).
- 10) Bill insert/mail: Provide targeted, direct communication to certain customers that highlights bill impacts. This direct email and mail communication will include a hypothetical example of an average customer's fixed charge amount, the estimated reduced volumetric usage charge, and a bill comparison estimating the impact on the bill. These communications will reference the website for additional information and resources, as well as resources for CARE customers which include information about qualifying and applying for Tier 1. Customer email: Send customer emails reinforcing the messaging described in (2) above.
- 11) Targeting mailings to CARE customers: These mailings will include additional explanation to reassure customers that their program participation benefits will not be impacted. It will also provide CARE customers with information on how to apply for lower income fixed charges (Tier 1).
- 12) Social media: Post content to Facebook and Twitter notifying customers of Liberty's fixed charge implementation with links to resources.

**Table 1: Estimated ME&O Costs**

| Tactic   | Reach/Potential Impact   | Estimate Phase 1 | Estimate Phase 2 | Total             | Description   | Justification  |
|--|--|------------------|------------------|-------------------|---|--|
| Website  | Approx. 75,200 views per month   | \$ -             | \$ -             | \$ -              | Liberty utilizes a dedicated web landing page in English and Spanish that outlines upcoming rate changes, provides sample bills to explain the customers' charges, links to information on payment arrangements, energy efficiency, and other rate and regulatory information that may be pertinent to customers. | Utilizes assets created via Toolkits, provides a spanish translation, aids in rate implementation education.   |
| Bill Insert/Mail (One Each)                          | One bill insert and one mailing to approx. 50,000 Customers                                | 47,000           | 47,000           | 94,000            | Liberty utilizes monthly bill inserts and direct mail multiple times per year. Liberty utilizes a professional mail house and takes advantage of bulk mail postage discounts.   | Will reach 100% of CalPeco's customer base and is the most effective form of non-digital communication.  |
| Customer E-Mail                                      | Approx. 25,000 Customers   | -                | -                | -                 | Liberty utilizes third-party software for mass emailing, which charges by month and/or number of e-mails sent. The design costs are based on historical design cost for graphics and flyers commissioned by our existing vendor.  | While it is effective, it will only reach roughly 50% of the customer base. However, it is still the most effective form of digital communication.   |
| Targeted Low-Income Mail                             | Approx. 4,151 CARE Customers   | 5,600            | 5,600            | 11,200            | Liberty utilizes direct mail to CARE customers. Liberty utilizes a professional mail house and takes advantage of bulk mail postage discounts.  | Most effective form of communication for this segment of customers.  |
| Toolkits (Includes graphic design and online assets) | Approx. 900,000 website views across all pages and approx. 6,600 followers on social media | 27,500           |                  | 27,500            | Liberty utilizes a third party vendor for design work, printing and shipping costs. Liberty routinely utilizes their vendor for similar work and based estimates off current costs.   | Supplemental education for events and customer care center. Online assets can be used on the company website, in social media, bill inserts, direct mail, direct email, as handouts at events or for partners, and more. |
| Social Media   | Approx. 4,000 views per Facebook post and approx. 1,600 views per X post                   | -                | -                | -                 | There is no cost to post on social media, however, Liberty will repurpose graphic and design assets from direct mail, toolkits, bill inserts and online assets that will have already been paid for and distribute through this channel.  | Utilizes assets created via Toolkits and is used to supplement IGFC messaging.   |
| Digital/Print Advertisements (6 Mo.)                 | Up to 500,000 impressions per month  | 13,000           |                  | 13,000            | Liberty currently runs multiple monthly and bi-monthly digital and print ad campaigns. The cost estimate for this line-item is based on current advertising placement costs plus ad design costs for existing campaigns running today.  | Increased educational reach and frequency. Has a substantially further reach than organic social media posts. Utilizing both print and digital media, this ad campaign could deliver over 500,000 impressions.           |
| <b>Total</b>   |  | <b>\$ 93,100</b> | <b>\$ 52,600</b> | <b>\$ 145,700</b> |   |  |

### **Tier Designation**

As directed by Ordering Paragraph 3 of D.24-05-028, this advice letter is submitted with a Tier 3 designation.

### **Effective Date**

The Company requests that this Tier 3 Advice Letter become effective upon Commission approval.

### **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 June 5, 2025, 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)

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: [elly.odoherty@libertyutilities.com](mailto:elly.odoherty@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/ Elly O'Doherty

Elly O'Doherty  
Manager, Rates and Regulatory Affairs  
Email: [Elly.ODoherty@libertyutilities.com](mailto:Elly.ODoherty@libertyutilities.com)

cc: Liberty General Order 96-B Service List  
R.22-07-005 Service List

**Attachment 1**

**Liberty Utilities (CalPeco Electric)**  
**Customer Charge Analysis**

| Customer Cost Allocation                     | Total Company    | Residential Permanent | Residential Non-Permanent | Small Commercial | Medium Commercial  | Large Commercial   | Irrigation          | OLS       | Street Lighting |               |
|--|------------------|-----------------------|---------------------------|------------------|--------------------|--------------------|---------------------|-----------|-----------------|---------------|
| Marginal Cost of Service (Distribution-Cust) | \$ 8,092,908     | \$ 2,331,194          | \$ 3,260,640              | \$ 255,329       | \$ 1,070,723       | \$ 321,026         | \$ 691,206          | \$ 1,638  | \$ 161,151      |               |
| Allocation %                                 | 100.00%          | 28.81%                | 40.29%                    | 3.15%            | 13.23%             | 3.97%              | 8.54%               | 0.02%     | 1.99%           | 69.10%        |
| Dist. Customer Revenues (Reconciled)         | \$ 61,464,455    | \$ 17,705,079         | \$ 24,764,086             | \$ 1,939,185     | \$ 8,131,983       | \$ 2,438,148       | \$ 5,249,612        | \$ 12,441 | \$ 1,223,922    | \$ 42,469,164 |
| Number of Customers                          | 49,937           | 17,712                | 26,580                    | 5,319            | 262                | 53                 | 11                  |           |                 |               |
| Customer Cost (Annual)                       | \$ 1,206         | \$ 1,000              | \$ 932                    | \$ 365           | \$ 31,038          | \$ 46,003          | \$ 480,881          |           |                 |               |
| <b>Customer Cost (Monthly)</b>               | <b>\$ 100.51</b> | <b>\$ 83.30</b>       | <b>\$ 77.64</b>           | <b>\$ 30.38</b>  | <b>\$ 2,586.51</b> | <b>\$ 3,833.57</b> | <b>\$ 40,073.38</b> |           |                 |               |
| Current Customer Charge                      |                  | \$ 13.83              | \$ 13.83                  | \$ 26.74         | 100.92             | \$ 822.98          | \$ 27.18            |           |                 |               |

| Customer Cost Analysis                      | Total Company    | Residential Permanent | Residential Non-Permanent | Total           |
|---|------------------|-----------------------|---------------------------|-----------------|
| Customer Costs                              | \$ 61,464,455    | \$ 17,705,079         | \$ 24,764,086             | \$ 42,469,164   |
| Number of Customers                         | 49,937           | 17,712                | 26,580                    | 44,293          |
| Customer Cost per Customer (Annual)         | \$ 1,206         | \$ 1,000              | \$ 932                    | \$ 959          |
| <b>Customer Cost per Customer (Monthly)</b> | <b>\$ 100.51</b> | <b>\$ 83.30</b>       | <b>\$ 77.64</b>           | <b>\$ 79.90</b> |
| <b>Proposed IGFC Customer Charge</b>        |                  |                       |                           | <b>\$ 31.70</b> |

**Attachment 2**

| Liberty Utilities (CalPeco Electric) |    |          |    | Settlement Revenue Requirements (RY 2024) (\$000) |        |          | DEM %   | CUS %   | Classifiers | Description  |
|--------------------------------------|----|----------|----|---|--------|----------|---------|---------|-------------|--|
| Customer Cost Analysis               |    |          |    | Total Company                                     | Demand | Customer |         |         |             |  |
|                                      |    |          |    |   |        |          |         |         |             |  |
| Net Plant                            |    |          |    |   |        |          |         |         |             |  |
| 302 Intang Plant-Franchise           | \$ | -        | \$ | -   | \$     | -        | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 303 CA Software                      |    | 33,925   |    | 21,622  |        | 12,303   | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 303 Software Solar Plant             |    | 30       |    | 19  |        | 11       | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 360.1 CA Land                        |    | 1,113    |    | 1,113   |        | -        | 100.00% | 0.00%   | DEM         | Costs vary based on changes in demands               |
| 360.2 CA Land Rights                 |    | 349      |    | 349   |        | -        | 100.00% | 0.00%   | DEM         | Costs vary based on changes in demands               |
| 361 CA Structures & Imp              |    | 4,596    |    | 4,596   |        | -        | 100.00% | 0.00%   | DEM         | Costs vary based on changes in demands               |
| 362 CA Station Equipment             |    | 50,478   |    | 50,478  |        | -        | 100.00% | 0.00%   | DEM         | Costs vary based on changes in demands               |
| 364 CA Poles,Twrs & Fixtures         |    | 116,705  |    | 89,341  |        | 27,364   | 76.55%  | 23.45%  | Poles       | Costs vary based on changes in customers and demands |
| 365 CA OH Cond & Devices             |    | 74,665   |    | 57,443  |        | 17,221   | 76.94%  | 23.06%  | OH-Lines    | Costs vary based on changes in customers and demands |
| 366 CA Underground Conduit           |    | 17,873   |    | 13,751  |        | 4,122    | 76.94%  | 23.06%  | UG-Lines    | Costs vary based on changes in customers and demands |
| 367 CA UG Cond & Devices             |    | 67,244   |    | 51,734  |        | 15,510   | 76.94%  | 23.06%  | UG-Lines    | Costs vary based on changes in customers and demands |
| 368 CA Line Transformers             |    | 39,167   |    | -   |        | 39,167   | 0.00%   | 100.00% | LineXFMRs   | Costs vary based on changes in transformers          |
| 369 CA Services                      |    | 31,522   |    | -   |        | 31,522   | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 370 CA Meters                        |    | 17,194   |    | -   |        | 17,194   | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 371 CA Installs Cust Premise         |    | 714      |    | -   |        | 714      | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 373 CA Street Lighy & SigSys         |    | 140      |    | -   |        | 140      | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 389 CA Land in Fee                   |    | 1,115    |    | 711   |        | 404      | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 389 CA Land Rights                   |    | 78       |    | 50  |        | 28       | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 390 CA Structures & Imp              |    | 14,526   |    | 9,258   |        | 5,268    | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 391 CA Office Furn & Equip           |    | 1,351    |    | 861   |        | 490      | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 392.1 CA Autos                       |    | 7,743    |    | 4,935   |        | 2,808    | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 393 CA Stores Equipment              |    | 53       |    | 34  |        | 19       | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 394 CA Tool,Shop & Garage Eq         |    | 993      |    | 633   |        | 360      | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 396 CA Power Operated Equip          |    | 69       |    | 44  |        | 25       | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 397 CA Communication Equip           |    | 3,760    |    | 2,396   |        | 1,364    | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 398 CA Miscellaneous Equip           |    | 825      |    | 526   |        | 299      | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Total Plant                          | \$ | 486,231  | \$ | 309,895   | \$     | 176,336  |         |         |             |  |
|                                      |    | 100.00%  |    | 63.73%  |        | 36.27%   |         |         |             |  |
| Other Rate Base                      |    |          |    |   |        |          |         |         |             |  |
| Materials & Supplies                 | \$ | 6,778    | \$ | 4,320   | \$     | 2,458    | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Other Working Capital                |    | 4,062    |    | 2,589   |        | 1,473    | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Working Cash                         |    | 796      |    | 133   |        | 664      | 16.69%  | 83.31%  | O&M         | Costs vary based on changes in O&M                   |
| Customer Advances for Construction   |    | (17,590) |    | (11,211)  |        | (6,379)  | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Accumulated Deferred Income Tax      |    | (48,809) |    | (31,108)  |        | (17,701) | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Other Deductions - COR & EADIT       |    | (32,036) |    | (20,418)  |        | (11,618) | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Total Other Rate Base                | \$ | (86,799) | \$ | (55,696)  | \$     | (31,104) |         |         |             |  |
|                                      |    |          |    |   |        |          |         |         |             |  |
| Total Rate Base                      | \$ | 399,432  | \$ | 254,200   | \$     | 145,232  |         |         |             |  |
| Required Rate of Return              |    | 7.320%   |    | 7.320%  |        | 7.320%   |         |         |             |  |
| Required Operating Income            | \$ | 29,237   | \$ | 18,607  | \$     | 10,630   |         |         |             |  |
|                                      |    | 100.00%  |    | 63.64%  |        | 36.36%   |         |         |             |  |

| Liberty Utilities (CalPeco Electric)         |    | Settlement Revenue Requirements (RY 2024) (\$000) |         |          | DEM %   | CUS %   | Classifiers  | Description                                       |
|--|----|---|---------|----------|---------|---------|--------------|---|
| Customer Cost Analysis                       |    | Total Company                                     | Demand  | Customer |         |         |              |   |
| O&M Expenses                                 |    |   |         |          |         |         |              |   |
| 580 Supervision & Engineering                | \$ | 266   | 176     | 91       | 65.99%  | 34.01%  | OPEXP582-587 | Costs vary based on changes in 582-587 expenses   |
| 581 Load Dispatching                         |    | 753   | 753     | -        | 100.00% | 0.00%   | DEM          | Costs vary based on changes in demands            |
| 582 Station Expenses                         |    | 29  | 29      | -        | 100.00% | 0.00%   | DEM          | Costs vary based on changes in demands            |
| 583 Overhead Line Expenses                   |    | 93  | 60      | 33       | 64.26%  | 35.74%  | Lines        | Costs vary based on changes in lines              |
| 584 Underground Line Expenses                |    | 58  | 37      | 21       | 64.26%  | 35.74%  | Lines        | Costs vary based on changes in lines              |
| 585 Street Lighting & Signal System          |    | 2   | -       | 2        | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 586 Meter Expenses                           |    | 9   | -       | 9        | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 587 Customer Installation                    |    | -   | -       | -        | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 588 Miscellaneous Distribution               |    | 2,277   | 1,502   | 774      | 65.99%  | 34.01%  | OPEXP582-587 | Costs vary based on changes in 582-587 expenses   |
| 589 Rents                                    |    | -   | -       | -        | 65.99%  | 34.01%  | OPEXP582-587 | Costs vary based on changes in 582-587 expenses   |
| 590 Supervision & Engineering                |    | -   | -       | -        | 63.73%  | 36.27%  | DISTPLT      | Costs vary based on changes in distribution plant |
| 591 Structures                               |    | 28  | 28      | -        | 100.00% | 0.00%   | DEM          | Costs vary based on changes in demands            |
| 592 Station Equipment                        |    | 85  | 85      | -        | 100.00% | 0.00%   | DEM          | Costs vary based on changes in demands            |
| 593 Overhead Lines                           |    | 2,055   | 1,321   | 735      | 64.26%  | 35.74%  | Lines        | Costs vary based on changes in lines              |
| 594 Underground Lines                        |    | 584   | 376     | 209      | 64.26%  | 35.74%  | Lines        | Costs vary based on changes in lines              |
| 599 Wildfire Mitigation                      |    | 22,788  | -       | 22,788   | 0.00%   | 100.00% | Wildfire     | Costs generally benefit all customers             |
| 596 Street Lighting & Signal System Expenses |    | 10  | -       | 10       | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 597 Meters                                   |    | 72  | -       | 72       | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 598 Misc. Distribution Plant                 |    | 857   | 546     | 311      | 63.73%  | 36.27%  | DISTPLT      | Costs vary based on changes in distribution plant |
| 901 Supervision                              |    | -   | -       | -        | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 902 Meter Reading Expense                    |    | 397   | -       | 397      | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 903 Customer Records & Collection            |    | 1,537   | -       | 1,537    | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 904 Uncollectible Accounts                   |    | 125   | -       | 125      | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 905 Misc. Customer Accounts                  |    | -   | -       | -        | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 907 Supervision                              |    | 303   | -       | 303      | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 908 Customer Assistance Expenses             |    | 946   | -       | 946      | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 909 Informational and Instr. Adv             |    | -   | -       | -        | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 910 Misc. Customer Service                   |    | 52  | -       | 52       | 0.00%   | 100.00% | CUS          | Costs vary based on changes in customers          |
| 920 A&G Salaries                             |    | 9,410   | 1,387   | 8,023    | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 921 Office Supplies & Expense                |    | 2,640   | 389     | 2,250    | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 922 Admin Expense Transferred                |    | (3,206)   | (473)   | (2,733)  | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 923 Outside Services Employed                |    | 1,671   | 246     | 1,424    | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 924 Property Insurance                       |    | 836   | 533     | 303      | 63.73%  | 36.27%  | DISTPLT      | Costs vary based on changes in distribution plant |
| 925 Injuries & Damages                       |    | 834   | 531     | 302      | 63.73%  | 36.27%  | DISTPLT      | Costs vary based on changes in distribution plant |
| 926 Pensions & Benefits                      |    | 2,128   | 314     | 1,814    | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 927 Franchise Requirements                   |    | -   | -       | -        | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 928 Regulatory Commission                    |    | 248   | 158     | 90       | 63.73%  | 36.27%  | DISTPLT      | Costs vary based on changes in distribution plant |
| 929 Duplicate Charges                        |    | -   | -       | -        | 63.73%  | 36.27%  | DISTPLT      | Costs vary based on changes in distribution plant |
| 930 Miscellaneous General                    |    | 74  | 11      | 63       | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 931 Rents                                    |    | 1   | 0       | 1        | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| 935 Maint. of General Plant                  |    | 372   | 55      | 317      | 14.74%  | 85.26%  | NonAG O&M    | Costs vary based on changes in nonAG O&M          |
| Total O&M                                    |    | \$  | 48,335  | \$       | 8,065   | \$      | 40,270       |   |
|  |    |   | 100.00% |          | 16.69%  |         | 83.31%       |   |

| Liberty Utilities (CalPeco Electric)    |    | Settlement Revenue Requirements (RY 2024) (\$000) |           |           | DEM %   | CUS %   | Classifiers | Description  |
|---|----|---|-----------|-----------|---------|---------|-------------|--|
| Customer Cost Analysis                  |    | Total Company                                     | Demand    | Customer  |         |         |             |  |
|   |    |   |           |           |         |         |             |  |
| <b>Depreciation Expense</b>             |    |   |           |           |         |         |             |  |
| 303 Intangible Plant                    | \$ | 4,910   | 3,129     | 1,781     | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 360.1 Land Rights                       |    | 6   | 4         | 2         | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 361 Structures & Improvements           |    | 91  | 58        | 33        | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| 362 Station Equipment                   |    | 830   | 830       | -         | 100.00% | 0.00%   | DEM         | Costs vary based on changes in demands               |
| 364 Poles, Towers & Fixtures            |    | 3,229   | 2,472     | 757       | 76.55%  | 23.45%  | Poles       | Costs vary based on changes in customers and demands |
| 365 OH Conductors & Devices             |    | 2,389   | 1,838     | 551       | 76.94%  | 23.06%  | OH-Lines    | Costs vary based on changes in customers and demands |
| 366 UG Conduit                          |    | 321   | 247       | 74        | 76.94%  | 23.06%  | UG-Lines    | Costs vary based on changes in customers and demands |
| 367 UG Conductors & Devices             |    | 1,919   | 1,477     | 443       | 76.94%  | 23.06%  | UG-Lines    | Costs vary based on changes in customers and demands |
| 368 Line Transformers                   |    | 1,062   | -         | 1,062     | 0.00%   | 100.00% | LineXFMRs   | Costs vary based on changes in transformers          |
| 369 Services                            |    | 576   | -         | 576       | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 370 Meters                              |    | 310   | -         | 310       | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 371 Inst. on Customer Premises          |    | 19  | -         | 19        | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 373 Street Light & Signal Systems       |    | 6   | -         | 6         | 0.00%   | 100.00% | CUS         | Costs vary based on changes in customers             |
| 389.1-399 General Plant                 |    | 1,679   | 1,070     | 609       | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Total Depreciation Expense              | \$ | 17,349  | \$ 11,125 | \$ 6,224  |         |         |             |  |
| <b>Taxes Other Than Income</b>          |    |   |           |           |         |         |             |  |
| Property Tax - Direct                   | \$ | 3,645   | 2,323     | 1,322     | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| Property Tax - Common                   |    |   | -         | -         | 63.73%  | 36.27%  | DISTPLT     | Costs vary based on changes in distribution plant    |
| FICA, FUTA, SUTA                        |    | 888   | 148       | 740       | 16.69%  | 83.31%  | O&M         | Costs vary based on changes in O&M                   |
| Medicare                                |    | 214   | 36        | 178       | 16.69%  | 83.31%  | O&M         | Costs vary based on changes in O&M                   |
| Franchise Tax                           |    | 1,267   | 806       | 461       | 63.64%  | 36.36%  | RATEBASE    | Costs vary based on changes in rate base             |
| Total TOTI                              | \$ | 6,013   | \$ 3,313  | \$ 2,700  |         |         |             |  |
| Deferred Income Taxes                   | \$ | 2,780   | \$ 1,769  | \$ 1,011  | 63.64%  | 36.36%  | RATEBASE    | Costs vary based on changes in rate base             |
| EADIT Amortization                      |    | (118)   | (75)      | (43)      | 63.64%  | 36.36%  | RATEBASE    | Costs vary based on changes in rate base             |
| Federal Income Tax                      |    | 2,461   | 1,566     | 895       | 63.64%  | 36.36%  | RATEBASE    | Costs vary based on changes in rate base             |
| California Corporate Franchise Tax      |    | 884   | 563       | 321       | 63.64%  | 36.36%  | RATEBASE    | Costs vary based on changes in rate base             |
| Total Income Taxes                      | \$ | 6,007   | \$ 3,823  | \$ 2,184  |         |         |             |  |
| <b>Total Expenses</b>                   | \$ | 77,705  | \$ 26,327 | \$ 51,378 |         |         |             |  |
| <b>Distribution Revenue Requirement</b> |    |   |           |           |         |         |             |  |
|   | \$ | 106,942   | \$ 44,933 | \$ 62,009 |         |         |             |  |
| %                                       |    | 100.00%   | 42.02%    | 57.98%    |         |         |             |  |

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: Elly O'Doherty

Phone #: 530-807-8987

E-mail: Elly.Odoherty@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) #: 248-E-A

Tier Designation: 3

Subject of AL: Income-Graduated Fixed Charge Implementation Proposal

Keywords (choose from CPUC listing): Increase Rates

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:  
D.24-05-028

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:

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:

Service affected and changes proposed<sup>1</sup>: see advice letter

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: Elly O'Doherty  
Title: Manager, Rates and Regulatory Affairs  
Utility Name: Liberty Utilities (CalPeco Electric) LLC  
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City: Downey State: California  
Telephone (xxx) xxx-xxxx: 530-807-8987  
Facsimile (xxx) xxx-xxxx:  
Email: [Elly.Odoherty@libertyutilities.com](mailto:Elly.Odoherty@libertyutilities.com)

Name: AnnMarie Sanchez  
Title: Coordinator  
Utility Name: Liberty Utilities (California)  
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Telephone (xxx) xxx-xxxx: 562-805-2052  
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Email: [AnnMarie.Sanchez@libertyutilities.com](mailto:AnnMarie.Sanchez@libertyutilities.com)

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                            |                                |