



Liberty Utilities (CalPeco Electric) LLC
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October 24, 2025

VIA EMAIL ONLY
EDTariffUnit@cpuc.ca.gov

Advice Letter 248-E-B

California Public Utilities Commission
Energy Division, Tariff Unit
505 Van Ness Avenue, 4th 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"). Liberty submitted AL-248-E-A supplemental advice letter 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 CARE Plus customer enrollment. Liberty submits this second supplemental advice letter to provide further detail on the ME&O budget and CARE/CARE Plus messaging.

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."¹

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

¹ D. 24-05-028, Order at 164-165.

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;
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 CARE and CARE Plus 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 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 CARE customers, and \$5.00 per month for CARE Plus customers.
6. A bill impact analysis demonstrating that both CARE and CARE Plus 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, CARE, and CARE Plus customers are shown, respectively, in Figures 3, 4, and 5 (below). Figures 4 and 5 show that CARE and CARE Plus 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 Total Rates	Monthly Usage (kWh)	IGFC Bill \$	Current Bill \$	Increase / (Decrease) \$	Increase / (Decrease) %
Winter Season					
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%
Summer Season					
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 (CARE)

Bill Impact Analysis Total Rates	Monthly Usage (kWh)	IGFC Bill \$	Current Bill \$	Increase / (Decrease) \$	Increase / (Decrease) %
Winter Season					
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%
Summer Season					
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 (CARE Plus)

Bill Impact Analysis Total Rates	Monthly Usage (kWh)	IGFC Bill \$	Current Bill \$	Increase / (Decrease) \$	Increase / (Decrease) %
Winter Season					
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%
Summer Season					
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, including eligibility and enrollment for CARE Plus.

- 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 (CARE Plus).
- 2) Bill insert/mail: Provide direct communication to all 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 and CARE Plus-eligible customers. Refer to Appendix B for sample draft marketing collateral and web content.
- 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 (CARE Plus). Refer to Appendix A for Liberty's new CARE/CARE Plus application, and Appendix B for sample draft marketing collateral and web content.
- 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, including the CARE/CARE Plus page on Liberty's website.
- 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 and CARE Plus 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 (CARE Plus).

- 10) Bill insert/mail: Provide direct communication to all 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 enrolling in CARE Plus. Refer to Appendix B for sample draft marketing collateral and web content.
- 11) Customer email: Send customer emails reinforcing the messaging described in (2) above.
- 12) 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 (CARE Plus). Refer to Appendix A for Liberty's new CARE/CARE Plus application, and Appendix B for sample draft marketing collateral and web content.
- 13) Social media: Post content to Facebook and Twitter notifying customers of Liberty's fixed charge implementation with links to resources.

CARE/CARE Plus Enrollment

Liberty will reduce barriers to CARE Plus enrollment by providing both non-CARE and current CARE customers with additional information, including the benefits of CARE and CARE Plus, eligibility criteria, the enrollment process and timeline, and how to apply online.

As discussed above, Phase I and Phase II of Liberty's ME&O plan will include this information in bill inserts, customer emails, targeted mailings to CARE customers, Liberty's website, and social media. Refer to Appendix A for Liberty's new CARE/CARE Plus application, and Appendix B for sample draft marketing collateral and web content.

Customers eligible for CARE or CARE Plus can complete the application with necessary income information at any time in advance of the planned 2026 implementation. Liberty will store this information and apply the CARE Plus base service charge to all eligible customers at the time of implementation.

Table 1: Estimated ME&O Costs

Tactic	Reach/Potential Impact	Unit Cost \$	Unit Cost Explanation	#/ Labor Hrs	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 to approx. 50,000 Customers	\$ 0.14	Direct printing and shipping cost to print the insert and ship it to the billing processing center.	50,000	\$ 7,000	\$ 7,000	\$ 14,000	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.
Direct Mail	One customer letter to approx. 50,000 Customers	\$ 0.64	Design, printing and postage. See attached "Liberty ME&O Proposal #25-393b."	50,000	\$ 32,000	\$ 32,000	\$ 64,000		
Customer E-Mail	Approx. 25,000 Customers			25,000	-	-	-	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	\$ 1.06	Design, printing and postage. See attached "Liberty ME&O Proposal #25-393c."	4,151	4,400	4,400	8,800	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	\$240/hr	Hourly rate estimate based on average of rates for Director, Senior Account Executive, and Creative Services Specialist. See attached fee schedule in "Liberty ME&O Contract."	45 hrs	10,800		10,800	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	\$2215/Mo	Estimate based on digital ads that Liberty has run in the past	6 months	13,290		13,290	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.
Total					\$ 67,490	\$ 43,400	\$ 110,890		

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 November 13, 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, 4th Floor
San Francisco, CA 94102-3298
Facsimile: (415) 703-2200
Email: edtariffunit@cpuc.ca.gov

The protest should be sent via email and U.S. Mail (and by facsimile, if possible) to Liberty Utilities (CalPeco Electric) LLC at the address shown below on the same date it is mailed or delivered to the Commission:

Liberty Utilities (CalPeco Electric) LLC
Attn: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Fax: 530-544-4811
Email: 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

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

Appendix A



California Alternate Rates for Energy (CARE)

The CARE Program gives qualifying customers a 20 percent discount or more on their electric bills whose incomes are 200% or below the Federal Poverty Guidelines. **Beginning in 2026, customers whose income falls below 100% of Federal Poverty Guidelines, as shown in the CARE Plus column, will receive an additional discount on their Base Services Charge. CARE customers will pay a \$10 base services charge and CARE Plus will pay a \$5 base services charge.**

It only takes three easy steps to see if you qualify:

1 Fill out step 1

2 Read/fill out step 2A or step 2B

3 Sign and date this form and return to Liberty

Step 1

CUSTOMER INFORMATION

Liberty Account No.

Name as shown on your Liberty bill

Home Address

City

State

Zip Code

Telephone

Mailing Address (if different from your home address)

City

State

Zip Code

Email

Step 2 Choose option 1 or 2, then fill out the back of this form.

Program and Household Income Qualifications

Option 1: Public Assistance Programs

You or someone in your household participates in at least one of the following public assistance programs:

- Medi-Cal/Medicaid
- CalFresh/SNAP
- TANF/Tribal TANF
- WIC
- MediCal for Families
- LIHEAP
- Supplemental Security Income (SSI)
- Bureau of Indian Affairs General Assistance
- Head Start Income Eligible (Tribal Only)
- National School Lunch's Free Lunch Program (NSL)

If your total household income falls below the maximum listed under CARE Plus in Option 2, you will qualify for a lower Base Service Charge beginning in 2026. In that case, please complete 2B.

Option 2: Household Income

Your gross annual household income falls within the ranges listed below: That means your combined household income (before taxes) from all sources must be no more than the following:

Maximum Gross Annual Household Income

Effective June 1, 2025 to May 31, 2026	No. of Persons in Household	Total combined Annual Income	
		CARE	CARE PLUS
CARE Upper Limit Calculations = 200% of Federal Poverty Guidelines	1-2	\$42,300	\$21,150
	3	\$53,300	\$26,650
	4	\$64,300	\$32,150
	5	\$75,300	\$37,650
	6	\$86,300	\$43,150
CARE PLUS Upper Limit Calculations = 100% of Federal Poverty Guidelines	7	\$97,300	\$48,650
	8	\$108,300	\$54,150
	Each Add'l Person	\$11,000	\$5,500

Step 2A

Option 1: Public Assistance Program

Do you or someone in your household participate in any of the following programs? If so, please check a box.

- | | |
|---|---|
| ☐ Medi-Cal/Medicaid | ☐ LIHEAP |
| ☐ CalFresh/SNAP | ☐ Supplemental Security Income (SSI) |
| ☐ TANF/Tribal TANF | ☐ Bureau of Indian Affairs General Assistance |
| ☐ WIC | ☐ Head Start Income Eligible (Tribal Only) |
| ☐ MediCal for Families | ☐ National School Lunch's Free Lunch Program (NSL) |

Step 2B

Option 2: Household Income and Sources of Income

Fill in blanks with number of persons in household and total combined annual income. Check (X) for all applicable sources of income. Customers must complete this section to qualify for CARE Plus.

Number of Persons in Household:

Total Combined Annual Income:

Maximum Gross Annual Household Income

Number of Persons in Household	Total combined Annual Income	
	CARE	CARE PLUS
1-2	\$42,300	\$21,150
3	\$53,300	\$26,650
4	\$64,300	\$32,150
5	\$75,300	\$37,650
6	\$86,300	\$43,150
7	\$97,300	\$48,650
8	\$108,300	\$54,150
Each Add'l Person	\$11,000	\$5,500

- | | |
|--|--|
| ☐ Wages or Salaries | ☐ Workers' Compensation |
| ☐ Interest or dividends from: Savings accounts, stocks or bonds, or retirement accounts | ☐ Social Security, SSI, SSP |
| ☐ Unemployment benefits | ☐ Pensions |
| ☐ Rental or royalty income | ☐ Insurance settlements |
| ☐ Scholarships, grants, or other aid used for living expenses | ☐ Legal settlements |
| ☐ Profit from self-employment (IRS Form 1040, Schedule C, line 29) | ☐ TANF |
| ☐ Disability payments | ☐ Child Support |
| | ☐ Cash |
| | ☐ Spousal Support |
| | ☐ Other Income |

Step 3

I certify:

- The Liberty bill is in my name.
- I will notify Liberty if I no longer qualify for this rate.
- I am not claimed on another person's income tax return.
- I understand Liberty reserves the right to proof of eligibility documentation.
- I will renew my application when requested by Liberty.

Read and sign the following statement: I state that the information I have provided in this application is true and correct. I understand that if I receive the discount without meeting the qualifications for it, I may be required to pay back the discount I received. I understand that Liberty can share my information with other utilities or their agents to enroll me in their assistance programs. I understand that unacceptable energy usage levels could result in removal from the program.

Signature X

Date

Return to Liberty:



Scan and Email to:
Cindy.Ramos@libertyutilities.com

US Mail:



Liberty CARE Program
933 Eloise Ave.,
South Lake Tahoe, CA 96150

Questions?



Please Call Toll Free at
1-800-782-2506

Additional Income Qualified Programs:

LIHEAP

Federal assistance may be achieved through the Low Income Home Energy Assistance Program (LIHEAP) which provides bill payment assistance, emergency bill assistance, and weatherization services. Call the Department of Community Services and Development at 1-866-675-6623 for more information.

Southwest Gas Corporation

gives income qualified customers a discount on their gas charges. Call 1-877-860-6020.

Liberty CARE customers may qualify for the Energy Savings Assistance Program (ESAP) which offers energy saving home improvements at NO COST; upgrades may include weatherization, insulation, minor home repairs and refrigerator replacements. Call 1-866-812-5766, 7 a.m. to 7 p.m.

Appendix B

California Alternate Rates for Energy


[Pay my bill](#)

[Moving](#)

[Water Quality](#)

[Outage Center](#)

[Programs & Rebates](#)
[Back](#)

California Alternate Rates for Energy (CARE/CARE Plus)

Available to qualified residential customers in California.

Low-income California residents may qualify for a discount on their monthly electric bill through California Alternate Rates for Energy (CARE) for Permanent Primary Residential Customers.

The California Public Utilities Commission (CPUC) ordered the state's regulated energy utilities to design a program that gives qualifying customers a 20 percent discount on their electric bills. This 20 percent discount applies to qualified low-income primary residential customers who receive their energy directly from Liberty or through a sub-meter such as in a mobile home park or an apartment complex.

Beginning in 2026, CARE customers will also receive a discounted monthly Base Services Charge.

Customers whose income falls below 100% of Federal Poverty Guidelines, as shown in the CARE Plus column below, will receive an additional discount on their Base Services Charge. CARE customers will pay a \$10 base services charge and CARE Plus will pay a \$5 base services charge.

Who Qualifies for the Discount?

There are two ways to qualify:

Option 1: Public Assistance Programs

You or someone in your household participates in at least one of the following public assistance programs:

- Medi-Cal/Medicaid
- CalFresh/SNAP
- TANF/Tribal TANF
- WIC
- Medi-Cal for Families
- LIHEAP
- Supplemental Security Income (SSI)
- Bureau of Indian Affairs General Assistance
- Head Start Income Eligible (Tribal Only)

Note: If your total household income falls below the maximum listed under CARE Plus in Option 2, you will qualify for a lower Base Services Charge beginning in 2026.

Option 2: Household Income

Your gross annual household income falls within the ranges listed below:

That means your combined household income (before taxes) from all sources must be no more than the following:

CARE Income Guidelines – Effective June 1, 2025 to May 31, 2026

Maximum Gross Annual Household Income

Number of Persons in Household	Total Combined Annual Income	
	CARE	CARE Plus
1 - 2	\$42,300	\$21,150
3	\$53,300	\$26,650
4	\$64,300	\$32,150
5	\$75,300	\$37,650
6	\$86,300	\$43,150
7	\$97,300	\$48,650
8	\$108,300	\$54,150
Each Additional Person	\$11,000	\$5,500

To find out what your total combined income is, add together the income for each person living with you. Sources of that income include, but are not limited to, the following:

- Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), State Supplementary Payment (SSP) benefits.
- Social Security benefits
- Royalties and rental income
- Child support or alimony payments
- Food stamps
- Cash public assistance
- Wages, tips, and salary from employment
- Unemployment benefits
- Veteran's benefits
- Disability benefits
- Interest and dividends
- Retirement benefits
- Student aid

How to Apply

If you think you qualify for the California Alternative Rates for Energy, click the link to apply online. If you have any questions, please contact Liberty at 1 (800) 782-2506.

For faster processing, apply online!

[Apply Online – English](#)

[Apply Online – Español](#)

Or download the CARE application for either the public assistance programs qualification or the household income qualification and mail it to:

Liberty CARE Program
933 Eloise Ave
South Lake Tahoe, CA 96150

 [Download Application – English](#)

 [Download Application – Español](#)

Remember: Only qualified customers may sign up for the program and unacceptable energy usage levels could result in removal from the program. When you fill out your application form you will be signing a document under penalty of perjury that says you meet the qualifications. You will need to provide proof of income which includes but is not limited to copies of any of the following documents:

- State or federal income tax returns; if no tax return was filed, paycheck stubs or 1099 tax forms can be used
- Copies of state and federal records proving income — such as military pensions, Social Security, or TANF records
- Other documents, such as bank statements, that would prove income levels.

Liberty will verify and certify all applicants' eligibility for the low-income rate. Liberty will also notify each low-income rate applicant of the status of their application.

Any Questions?

If you have any questions about the program call Liberty at 1-800-782-2506.

 [How to Read Your CARE Bill](#)

Electric Financial Help



[Pay my bill](#)



[Moving](#)



[Water Quality](#)



[Outage Center](#)



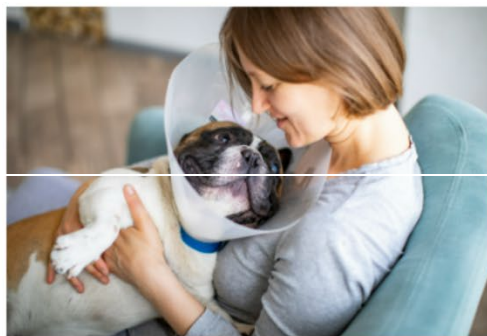
[Programs & Rebates](#)

[Back](#)

Life Happens. We're Here to Help.

Sometimes life happens, and not in the way you intended. If you find yourself with unexpected expenses and need help paying your utility bill, we're here for you. Learn more about California's financial assistance programs and how you can apply.

[Financial Assistance Programs Overview](#)



Programs

California Alternative Rates for Energy (CARE / CARE Plus)

Low-income California residents may qualify for a discount on their monthly electric bill through California Alternative Rates for Energy (CARE) for Residential Customers.

[Learn More ▶](#)

Low Income Home Energy Assistance Program (LIHEAP)

LIHEAP is a federally funded program that may be able to help you pay your energy bill. LIHEAP offers income-qualified customers a **one-time** payment to help:

- Pay heating or cooling bills.
- In an emergency or energy crisis, such as a utility disconnection.

[Learn More ▶](#)

Energy Savings Assistance Program (ESAP)

You may be able to take advantage of the Energy Savings Assistance Program to help pay for home improvements.

[Learn More ▶](#)

Medical Baseline Allowance

This program provides an increase in the baseline allowance, the amount of energy that is charged at the lowest possible rate, for customers with qualifying medical conditions.

[Learn More ▶](#)

Special Payment Arrangement (SPA)

If you are a residential customer and owe for past due service, you may have the chance to make an arrangement to pay over a period time and avoid disconnection of your service.

[Learn More ▶](#)

2022 California Arrearage Payment Program – Bill Credit

The California Arrearage Payment Program, or CAPP, is a state program to help pay customers' eligible past due energy utility bills that increased during the COVID-19 pandemic. CAPP reduces qualified customers' unpaid energy bills by directly applying a credit to their utility bill. Customers may qualify for a CAPP credit if they had an unpaid energy utility bill for services provided during the COVID-19 pandemic relief period of March 4, 2020, to December 31, 2021.

[Customer Letter](#) 

 [FAQs ▶](#)

Resources

Access and Functional Needs (AFN) Customers

When customers self-identify as AFN, Liberty will attempt to provide more information about Public Safety Power Shutoffs, low income programs, and other resources using the contact information on file or submitted through the web form.

[AFN Identification Form \(English\) ▶](#)

[AFN Identification Form \(Español\) ▶](#)

211 Resources

The 211 service connects people with health and human services and resources when assistance is needed. 211 provides incident specific information by coordinating with local emergency services. With 211, communities can access information about shelter, food, medical, and recovery services.

[Learn More ▶](#)



The new Base Service Charge is coming in early 2026

If your income qualifies for the CARE program, you will pay less on your bill. Please visit the Liberty website for income limitations and instructions for applying.

The new Base Service Charge for CARE customers will be lowered to \$10.00 per month. If customers qualify for CARE Plus, the new Base Service Charge will be lowered to \$5.00 per month.



CARE Customers

Existing CARE customers' program discounts will not be affected by the Base Service Charge. Once the Base Service Charge is implemented, CARE customers will automatically qualify for the discounted Base Service Charge, and will see a reduction in monthly bills for the same usage.

CARE Plus Customers

CARE customers may qualify for the new CARE Plus program, which offers additional savings for those who qualify based on income. CARE customers whose monthly household income (before taxes) is less than or equal to 100% of the Federal Poverty Level (FPL) will qualify for the CARE Plus program.

Existing CARE customers interested in applying for the CARE Plus program can find more information and instructions for applying on Liberty's Electric Financial Help page.

**Scan to learn
more and apply**



Liberty Utilities (CalPeco Electric) LLC
Advice Letter Filing Service List
General Order 96-B, Section 4.3

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[CPUC Home](#)

**California
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Commission**


CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R2207005 - OIR ADVANCE DEMAND F
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: OCTOBER 24, 2025

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

[Back to Service Lists Index](#)

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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-B

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 proposed¹: see advice letter

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
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505 Van Ness Avenue
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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	