



Liberty Utilities (CalPeco Electric) LLC  
933 Eloise Avenue  
South Lake Tahoe, CA 96150  
Tel: 800-782-2506  
Fax: 530-544-4811

December 17, 2025

**VIA EMAIL ONLY**

***EDTariffUnit@cpuc.ca.gov***

**Advice Letter No. 280-E  
(U 933-E)**

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

**Subject: Revisions to Rule 11 – Termination, Restoration, and Refusal of Service**

In compliance with Ordering Paragraphs (“OP”) 1 and 3 of California Public Utilities Commission (“CPUC”) Decision (“D.”) 25-06-012, Liberty Utilities (CalPeco Electric) LLC (U 933 E) (“Liberty”) hereby submits this **Tier 1** Advice Letter (“AL”) to revise its Rule 11 – Termination, Restoration, and Refusal of Service

**Purpose**

This Advice Letter revises Liberty’s Rule 11 – Termination, Restoration, and Refusal of Service tariff. The revisions to Liberty’s Rule 11 are in compliance with OP’s 1 and 3 of D.25-06-012.

The affected tariff pages include:

Rule 11 – Termination, Restoration, and Refusal of Service (CPUC Pages 213 and 215)

**Discussion**

Ordering Paragraph 1 of D.25-06-012 orders Liberty and other IOUs to offer the following reconnection options to customers whose service has been terminated:

- a. For first time disconnected customers, the utility must offer to restore service with no conditions other than participation in a payment plan
- b. For the three months immediately following that first reconnection, if the customer is disconnected again for failure to pay under their payment plan, the utility must reconnect that customer and allow the customer to maintain their payment plan, provided that the customer pays the balance accrued during the plan period or an amount agreed upon by the utility and the customer

Liberty has revised Rule No. 11, CPUC Sheet 213, Section B.2.d to be in compliance with this Ordering Paragraph.

Ordering Paragraph 3 of D.25-06-012 orders Liberty and other IOUs to inform a disconnected customer that their service will be reconnected, that utility must also inform the customer that the law requires service to be restored within a certain amount of time, unless safety or weather issues makes that impossible. Upon the customer's request, the utility must provide information on how to submit a complaint in the format of the customer's choice (e.g., via phone, email, or text message), provided the utility currently uses that method to communicate with customers.

Liberty has revised Rule 11, CPUC Sheet 215, Section J to be in compliance with this Ordering Paragraph.

**Effective Date**

Liberty requests that this **Tier 1** advice letter be effective as of December 17, 2025.

**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 January 6, 2026, 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 also be sent via email and U.S. Mail 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  
Email: [CaseAdmin@libertyutilities.com](mailto:CaseAdmin@libertyutilities.com)

Energy Division Tariff Unit  
California Public Utilities Commission  
December 17, 2025  
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**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 list.

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

cc: Liberty General Order 96-B Service List

**Rule No. 11**

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**TERMINATION, RESTORATION AND REFUSAL OF SERVICE**

**B. Nonpayment of Bills. (Continued)**

Such domestic service shall not be terminated for nonpayment for any customer complying with an amortization agreement entered into with the Company, provided the customer also keeps current his account for electric service as charges accrue in each subsequent billing period. If a residential customer fails to comply with an amortization agreement, the Company shall not terminate service without giving notice to the customer at least 48 hours prior to termination, of the conditions the customer is required to meet to avoid termination; but, such notice shall not entitle the customer to further investigation by the Company.

2. Electric Service to a domestic customer will not be terminated for nonpayment when the customer has established to the satisfaction of the company that:
  - a. Such termination would be especially dangerous to the health of the customer or a full-time resident of the customer's household\*; or
  - b. The customer or a full-time resident of the customer's household is among the elderly (age 62 or older) or disabled\*; and
  - c. He or she is temporarily unable to pay for such service in accordance with the provisions of the Company's Tariffs; and
  - d. The customer is willing to arrange installment payments, satisfactory to the company, including arrangements for prompt payment of subsequent bills.

For first time disconnected customers, the utility must offer to restore service with no conditions other than a payment or participation in an installment plan satisfactory to the company.

(N)

For the three months immediately following the first reconnection, if any customer's service is terminated again due to noncompliance with their installment payment agreement, the company must reconnect that customer and allow them to maintain their installment agreement, provided that the customer pays the balance accrued during the agreement period or an amount agreed upon by the company and the customer.

(N)

\* Certification from a licensed physician, public health nurse, or a social worker may be required by the company.

3. A customer's service may be terminated for nonpayment of a bill for service previously rendered him at any location served by the company provided such bill is not paid within 15 days after presentation of a termination of service notice that present service will be terminated for nonpayment of such bill for prior service, but in no case will service be terminated for nonpayment of such bill if less than 15 days after establishment of service at the new location. However, domestic service will not be terminated because of nonpayment of bills for other classes of service.
4. Where electric service is provided to residential users through a master meter, the company shall make every good faith effort to inform the actual users of the electric service when the account is in arrears that service will be terminated in 10 days.

**(Continued)**

**Rule No. 11**

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**TERMINATION, RESTORATION AND REFUSAL OF SERVICE**

- G. Failure to Establish or Re-establish Credit. For customer classes other than domestic, if, for an applicant's convenience, the company should provide service before credit is established or should continue service to a customer when credit has not been re-established in accordance with Rule No. 6, and he fails to establish or re-establish his credit as provided by a written notice of not less than 7 days for service, the company may terminate service.
- H. Noncompliance. Except as otherwise specifically provided in Rule No. 11, the company may terminate service to a customer for noncompliance with tariff schedules if, after written notice of at least 5 days, he has not complied with the notice. The company may dispense with the giving of such notice in the event of a dangerous condition, thus rendering the immediate termination of service to the premises imperative.
- I. Customer's Request for Service Termination. When a customer desires to terminate his responsibility for service, he shall give the company not less than two days' notice of his intention and state the date on which he wishes the termination to become effective. A customer may be held responsible for all service furnished at the premises until two days after receipt of such notice by the company or until the date of termination specified in the notice, whichever date is later.
- J. Restoration – Reconnection Charge. Excluding domestic service, the company may require payment of a reconnection charge before restoring service that has been terminated for nonpayment of bills or for failure otherwise to comply with tariff schedules. Per California Public Utilities Code 779.6, service must be restored within one business day of a payment or participation in an installment plan satisfactory to the company for field reconnections, or within 24 hours for remote connections (if remote connections are an option), except in situations relating to safety or extreme weather that make it impossible. In case the customer requested that such service be reconnected on the same day or outside regular business hours an additional charge may be made. The charges for restoration or reconnection of service are set forth in Schedule No.S.E. Service wrongfully terminated shall be restored without charge for the restoration of service, and a notification thereof shall be mailed to the customer at the billing address.
- Customers may submit a complaint about reconnection to the Company by calling 800-782-2506 or visiting our website at libertyenergyandwater.com.
- K. Inability to Pay. If upon receipt of a 15-day termination of service notice, a customer is unable to pay, he must first contact the company within the termination of service notice period to make special payment arrangements to avoid termination of service.

(N)

(N)

(N)

(N)

After contacting the company, if the customer alleges to the Commission an inability to pay and that lawful payment arrangements have not been extended to him, he should write to the Commission's Consumer Affairs Branch (CAB), Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102, to make an informal complaint.

**(Continued)**

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

**VIA EMAIL**

gbinge@ktminc.com;  
epoole@adplaw.com;  
cem@newsdata.com;  
rmccann@umich.edu;  
bhodgeusa@yahoo.com;  
cem@newsdata.com;  
dietrichlaw2@earthlink.net;  
ejanssen@b2energylaw.com;  
abrown@b2energylaw.com;  
bbiering@b2energylaw.com;  
plumascoco@gmail.com;  
marshall@psln.com;  
stephenhollabaugh@tdpud.org;  
gross@portersimon.com;  
mccluretahoe@yahoo.com;  
catherine.mazzeo@swgas.com;  
SDG&ETariffs@semprautilities.com;  
bcragg@downeybrand.com;  
AdviceTariffManager@sce.com;  
edtariffunit@cpuc.ca.gov;  
jrw@cpuc.ca.gov;

tlg@cpuc.ca.gov;  
dao@cpuc.ca.gov;  
kjl@cpuc.ca.gov;  
fadi.daye@cpuc.ca.gov;  
usrb@cpuc.ca.gov;  
vidhyaprabhakaran@dwt.com;  
judypau@dwt.com;  
dwtcpucdockets@dwt.com;  
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christopher.westling@cpuc.ca.gov;  
sletton@cityofslt.us;  
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xian.li@cpuc.ca.gov;  
Candace.Morey@cpuc.ca.gov;  
mts@cpuc.ca.gov



# 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) #: 280-E

Tier Designation: 1

Subject of AL: Revisions to Rule 11 – Termination, Restoration, and Refusal of Service

Keywords (choose from CPUC listing): Rules

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 12/17/25

No. of tariff sheets: 2

Estimated system annual revenue effect (%): n/a

Estimated system average rate effect (%): n/a

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Rule No. 11

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  
Address: 9750 Washburn Road  
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)  
Address: 9750 Washburn Road  
City: Downey State: California  
Telephone (xxx) xxx-xxxx: 562-805-2052  
Facsimile (xxx) xxx-xxxx:  
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	