



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

July 9, 2026

VIA EMAIL ONLY
EDTariffUnit@cpuc.ca.gov

Advice Letter No. 299-E
(U 933-E)

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

Subject: Implementation of the Renewable Choice Tariff

I. Purpose

Pursuant to Decision (“D.”) 20-08-030, which approved Liberty Utilities (CalPeco Electric) LLC’s (“Liberty”) Green Tariff framework, Liberty hereby submits this Tier 2 Advice Letter requesting authority to implement the Renewable Choice Tariff using the Commission-approved methodology with updated cost and production data. Accordingly, Liberty submits this advice letter to implement the Commission-approved framework and associated tariff sheets.

II. Background

Some customers in Liberty’s service territory have expressed interest in purchasing electricity sourced entirely from renewable generation resources. To help these customers reach this goal, Liberty proposes to establish a Renewable Choice Tariff, which will allow these customers to elect service supported by 100 percent renewable generation. The Renewable Choice Tariff provides interested customers with the opportunity to purchase electricity sourced from Liberty’s Luning and Turquoise Solar Facilities. Revenue collected under the Renewable Choice Tariff will be credited to the Energy Cost Adjustment Clause (“ECAC”), thereby reducing costs otherwise recovered from non-participating customers through the ECAC.

In its 2019 General Rate Case (“GRC”) application,¹ Liberty requested and received approval to establish a Green Tariff. Since that approval, there have been significant changes to the large investor-owned utilities’ (“IOUs”) Green Tariff/Shared Renewables (“GTSR”) programs established under Senate Bill (“SB”) 43 through proceeding A.22-05-022. D.24-05-065 and D.26-06-006 ordered the large CAISO-participating IOUs to restructure their green tariff

¹ A.18-12-001.

offerings consistent with CAISO-based market integration and other directives litigated in that proceeding. Liberty is a non-CAISO utility, fully served under the NV Energy Balancing Authority, and outside the scope of A.22-05-022. As such, the modifications made to the large IOU Green Tariff programs are not applicable to Liberty's Renewable Choice Tariff. The Renewable Choice Tariff is the implementation of the Green Tariff framework approved in D.20-08-030. This advice letter does not propose any modification to the basic methodology approved in D.20-08-030 and is limited to implementing that previously approved framework using updated cost and production data.

III. Renewable Choice Tariff

Liberty's proposed Renewable Choice Tariff enables interested customers to purchase electricity sourced from Liberty's existing Luning and Turquoise Solar Facilities, which are currently included in base rates. The Renewable Choice Tariff rate is designed to recover the costs associated with providing customers with 100 percent renewable energy from these facilities.

The Renewable Choice Tariff rate is initially calculated using the forecast cost of energy produced by the Luning and Turquoise Solar Facilities, based on revenue requirements, expected energy production, and average costs consistent with the methodology approved in D.20-08-030. The rate is then reduced to reflect costs already recovered from all customers through existing rates and costs avoided by serving participating customers with renewable generation. These credits include: (1) the portion of Luning and Turquoise costs already recovered in base rates; (2) Liberty's cost of complying with California's Renewables Portfolio Standard requirements; and (3) the cost of conventional energy purchases that Liberty would otherwise incur to serve participating customer load. Liberty's forecasted Renewable Choice rate is \$0.0186/kWh.

Revenues collected through the Renewable Choice Tariff will be credited to Liberty's ECAC, thereby reducing ECAC-related costs for customers who do not participate in the program.

Enrollment will be available on a first-come, first-served basis, subject to the available output of the Luning and Turquoise Solar Facilities. Liberty will maintain a waiting list if customer participation reaches the available renewable generation. Customers on the waiting list will be enrolled as program capacity becomes available.

Liberty will update the Renewable Choice Tariff rate in its future ECAC filings.

Attachments

Attachment 1 contains the calculation of the Renewable Choice Tariff rate.

Attachment 2 contains the proposed Rule 25 (Renewable Choice) tariff.

Attachment 3 contains the proposed Renewable Choice Tariff (RCT) rate schedule tariff sheet.

Tier Designation

Pursuant to General Order 96-B, Section 5, this advice letter is submitted with a Tier 2 designation. Tier 2 treatment is appropriate because this advice letter implements a framework previously approved by the Commission in D.20-08-030 and does not seek modifications to that approved framework.

Effective Date

Liberty requests that this Tier 2 Advice Letter become effective on September 1, 2026.

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 July 29, 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, 4th Floor
San Francisco, CA 94102-3298
Facsimile: (415) 703-2200
Email: edtariffunit@cpuc.ca.gov

The protest should be sent via email to Liberty at the address shown below on the same date it is mailed or delivered to the Commission:

Liberty Utilities (CalPeco Electric) LLC
Attn: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Email: 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 list.

Energy Division Tariff Unit
California Public Utilities Commission
July 9, 2026
Page 4

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
Liberty Utilities (CalPeco Electric) LLC
Manager, Rates and Regulatory Affairs
Phone: (530) 807-8987
Email: Elly.ODoherty@libertyutilities.com

Attachments

cc: Liberty General Order 96-B Service List
A.18-12-001 Service List

Attachment 1

Liberty Utilities (CalPeco Electric) LLC
 Advice Letter 299-E
 Renewable Choice Tariff Rate Calculation

Renewable Choice Tariff Rate Calculation
 Luning and Turquoise Costs

Liberty Generation - Costs, Production and Recovery

1	Generation Revenue Requirement (latest GRC decision)	\$	15,339,532	\$
2	Luning & Turquoise Average Production (2025-2035)		119,071,178	kWhs
3	Luning & Turquoise Cost per kWh	\$	0.1288	\$/ kWh
4	Approved Annual Retail Sales (latest GRC decision)		587,993,993	kWhs
5	Recovery through base rates from customers	\$	0.0261	\$/ kWh

RPS Obligation not met with LU renewable Resources

6.a	RPS Obligation - 49%		288,117,056	kWhs
6.b	Average RPS Obligation in excess of Luning & Turquoise		169,045,878	kWhs
6.c	Average RPS Obligations met through Luning & Turquoise		41%	
6.d	Average RPS Obligations met through Market		59%	

Forecast of Costs to meet RPS obligations through Market

7	Authorized Power Purchase Costs (D.25-08-012)	\$	33,899,507	\$
8	Average Power Purchase Cost Recovered From ALL Customers	\$	0.0577	\$/ kWh

Calculation of Renewable Choice Tariff Rate

9	Renewable Choice Rate	\$	0.0186	\$/ kWh
---	-----------------------	----	--------	---------

- 1 2025 GRC D.26-03-017
- 2 Average production over 10 years
- 3 Lines (1) / (2)
- 4 2025 GRC D.26-03-017
- 5 Lines (1) / (4)
- 6.a Line (4) x 49%
- 6.b Lines (6.a) - (2)
- 6.c Lines (2) / (6.a)
- 6.d Lines (6.b) / (6.a)
- 7 2025 ECAC D.25-08-012
- 8 Lines (7) / (4)
- 9 Lines (3) - (5) - (8) x (1 - Line 6.d)

Attachment 2

ELECTRIC RULE 25

RENEWABLE CHOICE TARIFF

A. PURPOSE: Liberty is committed to California’s goal of a cleaner energy future and has taken steps in this direction with the installation of the Luning and Turquoise Solar Facilities, which have increased Liberty’s renewable generation to meet approximately 20% of its customers’ load.

(N)

B. APPLICABILITY: The Renewable Choice Tariff is available to all customers up to the limit of Luning and Turquoise’s production, which is forecast at approximately 119 million kWh per year.

C. RENEWABLE CHOICE TARIFF BACKGROUND

1. Liberty’s Renewable Choice Tariff is designed to allow interested customers an opportunity to purchase their power directly from Liberty’s Luning and Turquoise Solar Facilities, which are currently in base rates.
2. The design of the Renewable Choice Tariff rate takes into account both the currently approved recovery of Luning and Turquoise in base rates and the cost of purchasing power to meet the customer load that is not met by Luning and Turquoise.
3. The intent is to include in the Renewable Choice Tariff Rate only the Luning and Turquoise costs not recovered in base rates (including Renewable Choice Tariff customers).

D. RENEWABLE CHOICE TARIFF ACCOUNTING

1. The Renewable Choice Tariff initially calculates the estimated cost of a kWh of energy generated by Luning and Turquoise using costs and expected production. This value is then credited with the Luning and Turquoise kWh charge included in base rates and recovered from all customers, including Renewable Choice Tariff customers.
2. The Renewable Choice Tariff rate is further credited with Liberty’s cost to meet the California RPS obligation and cost of Liberty purchasing conventional electricity to meet existing load that is not provided from the Luning and Turquoise Solar Facilities. The rates collected from customers on the Renewable Choice Tariff will be credited to Liberty’s Energy Cost Adjustment Clause (“ECAC”), which will reduce electricity costs for existing customers not on the Renewable Choice Tariff.

E. RENEWABLE CHOICE TARIFF RATES

1. Under the Renewable Choice Tariff, a customer pays the difference between their current generation charge and a charge that reflects the cost of Liberty’s goal of procuring 100% solar generation for their electricity needs.
2. Liberty’s Renewable Choice Tariff is available to all customers at the rate shown on the Renewable Choice Tariff Rate Schedule (Schedule No. RCT).

Customers will be added to the Renewable Choice Tariff on a first-come, first-served basis, up to the limit of Luning and Turquoise’s estimated production, which is forecast at approximately 119 million kWh per year.

(N)

Advice Letter No. 299-E

Issued by

Eric Schwarzrock

Date Filed July 9, 2026

Decision No. D.20-08-030

Name

President

Effective September 1, 2026

Title

Resolution No. _____

Attachment 3

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
SOUTH LAKE TAHOE, CALIFORNIA

Original _____ CPUC Sheet No. 455
Canceling _____ CPUC Sheet No. _____

SCHEDULE NO. RCT

(N)

RENEWABLE CHOICE TARIFF RATE

APPLICABILITY

The Renewable Choice Tariff Rate is available to all Liberty customers. See Rule 25 Renewable Choice Tariff for complete details.

TERRITORY

Entire California service area.

RATES

The customer shall pay the Renewable Choice Tariff Rate at a cost of \$0.0186 /kWh.

(N)

Advice Letter No. 299-E

Issued by
Eric Schwarzrock
Name

Date Filed July 9, 2026

Decision No. D.20-08-030

President
Title

Effective September 1, 2026

Resolution No. _____

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

VIA EMAIL

epoole@adplaw.com;
cem@newsdata.com;
rmccann@umich.edu;
bhodgeusa@yahoo.com;
cem@newsdata.com;
dietchlaw2@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;
jointahoespark@gmail.com
dao@cpuc.ca.gov;
kjl@cpuc.ca.gov;
usrb@cpuc.ca.gov;
vidhyaprabhakaran@dwt.com;
judypau@dwt.com;
dwtcpucdockets@dwt.com;
dan.marsh@libertyutilities.com;
sharon.yang@libertyutilities.com;
ginge@regintl.com;
christopher.westling@cpuc.ca.gov;
sletton@cityofsl.us;
sacksyboy@yahoo.com;
xian.li@cpuc.ca.gov;
Candace.Morey@cpuc.ca.gov;
mts@cpuc.ca.gov;
Brent.ValenciaSantos@libertyutilities.com;
AnnMarie.Sanchez@libertyutilities.com;
Christina.Pak@libertyutilities.com;
eramos@tahoedailytribune.com;
dramirez.calstrat@gmail.com;
tbrunello@outlook.com;
Chelsi.Sparti@brookfieldrenewable.com



California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: A1812001 - LIBERTY UTILITIES (C
FILER: LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
LIST NAME: LIST
LAST CHANGED: AUGUST 27, 2020**

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

[Back to Service Lists Index](#)

Parties

SHANNA FOLEY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
320 West 4th Street Suite 500
Los Angeles, CA 90013
FOR: PUBLIC ADVOCATES OFFICE

SHARON YANG
DIR - LEGAL SERVICES
LIBERTY UTILITIES (CALIFORNIA)
9750 WASHBURN ROAD / PO BOX 7002
DOWNEY, CA 90241
FOR: LIBERTY UTILITIES

BRIAN T. CRAGG
ATTORNEY
GOODIN, MACBRIDE, SQUERI & DAY, LLP
505 SANSOME ST., STE. 900
SAN FRANCISCO, CA 94111
FOR: A-3 CUSTOMER COALITION

Information Only

MRW & ASSOCIATES LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JESSIE CROZIER
LUMINUS MANAGEMENT
350 WEST 43RD APT 14F
NEW YORK, NY 10036

BLAKE ELDER
POLICY RESEARCH ANALYST
EQ RESEARCH, LLC
1155 KILDAIRE FARM ROAD, SUITE 203
CARY, NC 27511

GEOFFREY INGE
DIR - REGULATORY SERVICES
KINECT ENERGY
777 29TH STREET, STE. 200
BOULDER, CO 80027
FOR: A-3 CUSTOMER COALITION.

C. DREW CAYTON
SR. REGULATORY CONSULTANT
KINECT ENERGY GROUP
777 29TH STREET, STE. 200
BOULDER, CO 80303
FOR: A-3 CUSTOMER COALITION

LAURA L. KRANNAWITTER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST AND RETAIL CHOICE BRANCH
320 West 4th Street Suite 500
Los Angeles, CA 90013

JONI A. TEMPLETON
ATTORNEY
LKP GLOBAL LAW, LLP
1901 AVENUE OF THE STARS, SUITE 480
LOS ANGELES, CA 90067
FOR: LIBERTY UTILITIES (CALPECO
ELECTRIC) LLC

VICTOR T. FU
ATTORNEY
LKP GLOBAL LAW, LLP
1901 AVENUE OF THE STARS, STE. 480
LOS ANGELES, CA 90067
FOR: LIBERTY UTILITIES

ANNMARIE LETT
COORDINATOR - RATES & REG AFFAIRS
LIBERTY UTILITIES (CALIFORNIA)
9750 WASHBURN ROAD
DOWNEY, CA 90241

DAN MARSH
MGR. - RATES & REGULATORY AFFAIRS
LIBERTY UTILITIES (CALIFORNIA)
9750 WASHBURN ROAD / PO BOX 7002
DOWNEY, CA 90241

EDWARD JACKSON
DIR - REVENUE REQUIREMENTS
LIBERTY UTILITIES (CALIFORNIA)
9750 WASHBURN ROAD / PO BOX 7002
DOWNEY, CA 90241-7002

CHARLOTTE CHITADJE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FAUZIA NAWAZ
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JUSTIN H. FONG
CALIF PUBLIC UTILITIES COMMISSION
BROADBAND, POLICY & ANALYSIS BRANCH
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MANISHA LAKHANPAL
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5023
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MASOUD FOUDEH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SHELBY CHASE
CALIF PUBLIC UTILITIES COMMISSION
WILDFIRE SAFETY & ENFORCEMENT BRANCH
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

YAKOV LASKO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON SCHNEIDER HARRIS & DONLAN LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931

[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)



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) #: 299-E

Tier Designation: 2

Subject of AL: Implementation of the Renewable Choice Tariff

Keywords (choose from CPUC listing): Tariffs

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-5417

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: 9/1/26

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: Schedule RCT, Rule 25

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: 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

Name: AnnMarie Sanchez
Title: Coordinator
Utility Name: Liberty Utilities (California)
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 562-325-7051
Facsimile (xxx) xxx-xxxx:
Email: AnnMarie.Sanchez@libertyutilities.com

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	