



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

April 7, 2025

VIA EMAIL ONLY
EDTariffUnit@cpuc.ca.gov

**Advice Letter 265-E-A
(U 933-E)**

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

**Subject: Modifications to the Small Business California Climate Credit Distribution
Methodology Compliance Supplemental Filing 2025**

Purpose

Pursuant to Resolution E-5339, Liberty Utilities (CalPeco Electric) LLC (Liberty) submits this Supplemental Tier 1 advice letter to provide Customer information regarding eligibility changes resulting from the Small Business California Climate Credit (SBCCC) eligibility review per Ordering Paragraphs (OPs) 2, 3, and 5.

Summary

Liberty has identified one Small Business customer in its service territory no longer eligible to receive the SBCCC due to 100 or more accounts. Liberty is directed to implement changes to eligibility for the SBCCC as soon as possible and no later than April 1, 2025 following notification to the SBCCC recipient outlining changes to eligibility requirements. Liberty is providing this eligibility change to Energy Division via a Tier 1 advice letter as a result of an eligibility review.

Background

On August 28, 2024, the California Public Utilities Commission (CPUC) issued Resolution E-5339 to modify the SBCCC distribution methodology. The proposed outcomes of the resolution are as follows:

- Changes the eligibility criteria used by the investor-owned utilities (IOUs) to ensure prudence in the distribution of the Small Business California Climate Credit.
- Recipients with 100 or more eligible accounts under the existing usage criteria are no longer eligible to receive the Small Business California Climate Credit on any account.

- Establishes notification requirements by IOUs to newly ineligible recipients.
- Establishes notification requirements by IOUs to Energy Division for eligibility changes.¹

The existing definition of a small business is as follows: “Any non-residential customer on a General Service or Agricultural tariff with demand not exceeding 20 kW in more than three months in the previous 12-month period is considered to be a small business.”² Liberty has identified one small business customer in its service territory with greater than 100 accounts, no longer eligible to receive the SBCCC. Liberty is notifying the customer as far in advance as possible before implementing modification of the distribution methodology.

Confidentiality

Liberty provides confidential customer information upon formal request by the CPUC, redacted in this public filing.

Distinct Count of Contract Account Row Labels	Column Labels	
	CEEC_A1	Grand Total
	137	137

Effective Date

Liberty requests that this Tier 1 Advice Letter be effective as of April 1, 2025.

Tier Designation

Pursuant to General Order 96-B, and Resolution E-5339, this Advice Letter is being submitted with a Tier 1 designation.

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 April 27, 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

¹ Resolution E-5339 at page 1.

² Resolution E-5339 at page 4.

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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

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.

Correspondence

Any correspondence regarding this compliance filing should be sent by email to the attention of:

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

If additional information is required, please do not hesitate to contact me.

Respectfully submitted,

LIBERTY

/s/ Elly O'Doherty

Elly O'Doherty
Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List

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;
rmliddell@energyattorney.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;

jaime.gannon@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;
dan.marsh@libertyutilities.com;
sharon.yang@libertyutilities.com;
ginge@regintluc.com;
christopher.westling@cpuc.ca.gov;
sletton@cityofslt.us;
sacksyboy@yahoo.com;
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) #: 265-E-A

Tier Designation: 1

Subject of AL: Modifications to the Small Business California Climate Credit Distribution Methodology Compliance Filing 2025

Keywords (choose from CPUC listing): Compliance

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-5339

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

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

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

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

Resolution required? ☐ Yes ☒ No

Requested effective date: 4/1/25

No. of tariff sheets: n/a

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

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

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

Tariff schedules affected: n/a

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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

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

Name: Elly O'Doherty
Title: Manager, Rates and Regulatory Affairs
Utility Name: Liberty Utilities (CalPeco Electric) LLC
Address: 701 National Ave
City: Tahoe Vista 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: 562-805-2052
Facsimile (xxx) xxx-xxxx:
Email: 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	