



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

September 18, 2025

VIA EMAIL ONLY
EDTariffUnit@cpuc.ca.gov

**Advice Letter 272-E
(U 933-E)**

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

Subject: Liberty Utilities (CalPeco Electric) LLC (U-933 E) Tier 1 Advice Letter to comply with Decision (D.)25-06-034, Ordering Paragraph (OP) 10.

Purpose

Pursuant to D.25-06-034, OP 10, Liberty Utilities (CalPeco Electric) LLC (Liberty) submits this Tier 1 advice letter providing responses to the questions outlined in Section 5.2.2, regarding: customer meters, 15-minute interval data, true peak demand data, data storage and systems updates, and green button data updates.

Summary

Within 90 days of the issuance of D.25-06-034, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities LLC, PacifiCorp, and Bear Valley Electric Service Inc. shall: File a Compliance Filing to the docket of this proceeding and served on this proceeding's service list, providing responses to the questions outlined in Section 5.2.2.

Background

On June 20, 2025, the California Public Utilities Commission (CPUC) issued D.25-06-034 in Rulemaking 19-01-011, adopting new reporting requirements detailed in Appendix A of the decision. Liberty and the other Small and Multi-Jurisdictional Utilities (SMJUs) are exempted from reporting on fields related to common facility cost treatment. OP 10 directs the Investor-Owned Utilities (IOUs) including Liberty, within 90 days, to:

- (a) File a Compliance Filing to the docket of this proceeding and served on this proceeding's service list, providing responses to the questions outlined in Section

- (b) 5.2.2, regarding: customer meters, 15-minute interval data, true peak demand data, data storage and systems updates, and green button data updates; and
- (c) Confer with the California Public Utilities Commission's Energy Division prior to the filing of the Compliance Filing to confirm that the Compliance Filing includes all relevant topics and information necessary to inform and evaluate potential future policies on customer access to peak demand data.

Liberty will meet and confer with Energy Division at the earliest convenience of CPUC staff to confirm this Compliance Filing Advice Letter includes all information necessary to inform future policy as directed by OP 10 (b).

OP 10 Compliance

1. Customer Meters

Liberty has not yet deployed Advanced Metering Infrastructure (AMI) smart meters in its service territory. Without AMI, Liberty is unable to automatically capture interval or true peak demand information. Any such data must be obtained via manual field reads.

2. 15-Minute Interval Data

Liberty does not currently capture 15-minute interval data for all customers. Customers do not have access to 15-minute interval usage information at present. They only receive monthly kWh usage on their bills. Liberty is planning on deploying AMI in 2026, which will enable 15-minute interval data collection and reporting.

3. True Peak Demand Data

Liberty's existing meters do not all measure true peak demand at the 15-minute interval level. Certain commercial customers are equipped with demand meters capable of registering peak kW over a billing period.

4. Data Storage and CIS/IT Systems Updates

Liberty stores monthly billing data in its Customer Information System (CIS). No interval data is generated for most customers. Liberty has upgraded its CIS to improve integration and billing flexibility. The CIS does not enable system wide interval data collection without AMI.

5. Green Button (Connect / My Data) Updates

Liberty would need to upgrade its IT infrastructure to support data collection including deploying smart meters through AMI, to adopt the Green Button Connect My Data

standard. Necessary upgrades may include, AMI deployment, backend storage systems, and adopting data transfer protocols.

The table below provides responses to the questions outlined in Section 5.2.2. of D.25-06-034:

Topic/Question #	Section 5.2.2. Questions:	Liberty Responses:
<i>Customer Meters</i>		
1	How many customer meters are in your territory?	50,661
2	How many meters serve each of your respective customer classes (residential, commercial etc.)?	Commercial = 5,810. Residential = 44,851.
<i>15-Minute Interval Data</i>		
3	How many meters in total and per customer class currently log at least 15-minute interval usage and demand data today?	Commercial = 187. Residential = 211.
4	How many meters in total and per customer class are currently capable of logging at least 15-minute interval data today, but are not currently logging 15-minute interval data?	Commercial = 2. Residential = 2.
4a	What actions and processes must the utility undertake to enable these meters to begin logging at least 15-minute data? Describe in detail all the steps that need to happen, and describe who must take those steps (utility staff, third party contractors, etc.);	Place record ID on meters. Liberty staff.
4b	Does this require multiple batches of changes? Does	

	each make/model of meter require a separate over-the-air update? Describe in detail;	Each meter is its own batch. No over-the air update.
4c	How much time would be required to enable all the existing meters in this category to begin collecting 15-minute data?	Approximately one month.
5	How many meters in total and per customer class require an over-the-air update to be capable of logging at least 15-minute interval data?	Zero.
5a	What actions and processes must the utility undertake to enable these meters to begin logging at least 15-minute data? Describe in detail all the steps that need to happen, and describe who must take those steps (utility staff, third party contractors, etc.)	N/A.
5b	Does this require multiple batches of updates? Does each make/model of meter require a separate over-the-air update? Describe in detail.	N/A.
5c	How much time would be required to complete over-the-air updates for all meters in this category to enable collection of at least 15-minute interval data?	N/A.
6	How many meters in total and per customer class require on-site work (but not replacement) to be capable of logging at least 15-minute interval data?	Zero.

7	How many meters in total and per customer class require replacement to be capable of logging at least 15-minute interval data?	Commercial = 5,621. Residential = 44,638
<i>True Peak Demand Data</i>		
8	How many meters in total and per customer class currently capture true (instantaneous) peak demand?	Commercial = 4,605
9	How many meters in total and per customer class are currently capable of logging true peak demand, but are not currently logging true peak demand?	Zero.
9a	What actions and processes must the utility undertake to enable these meters to begin logging at least 15-minute data? Describe in detail all the steps that need to happen, and describe who must take those steps (utility staff, third party contractors, etc.)	Replacement by Liberty staff.
9b	Does this require multiple batches of changes? Does each make/model of meter require a separate over-the-air update?	No over-the-air capability.
9c	How much time would be required to enable all the existing meters in this category to begin collecting true peak demand data?	N/A.
10	How many meters in total and per customer class require an over-the-air update to be capable of	N/A.

	logging true peak demand data?	
10a	What actions and processes must the utility undertake to enable these meters to begin logging at least 15-minute data? Describe in detail all the steps that need to happen, and describe who must take those steps (utility staff, third party contractors, etc.)	N/A.
10b	Does this require multiple batches of changes? Does each make/model of meter require a separate over-the-air update?	N/A.
10c	How much time would be required to enable all the existing meters in this category to begin collecting true peak demand data?	N/A.
11	How many meters in total and per customer class require on-site work (but not replacement) to be capable of logging true peak demand data?	Zero.
12	How many meters in total and per customer class require replacement meters to be capable of logging true peak demand data?	1,016
13	Describe any and all other actions that need to be performed that are not captured in questions 4-7 to enable capture of true peak demand data.	N/A.
<i>Data Storage and System Updates</i>		

14	Describe in detail the data storage, network, application, and other system updates required to handle the collection of at least 15-minute interval data.	FCS - MV90(XI).
14a	What is the process for performing each of these updates?	After replacement, meter needs to be probed and loaded through MV90.
14b	Who performs each of these updates?	Liberty staff.
14c	What is the approximate timeframe for making these back-end changes?	Approximately one month.
<i>Green Button Data Updates</i>		
15	What type of IT infrastructure changes need to be made to allow 15-minute interval demand data can be shared with customers via Green Button data?	Liberty does not currently provide Green Button Download My Data (DMD) or Green Button Connect (GBC).
15a	Who needs to perform these changes? Can the electric utility perform this in-house, or does this require a third party?	Liberty intends to align any potential Green Button implementation with a future AMI deployment.
15b	What is an approximate timeframe for being able to make these changes for customers?	Dependent on completion of AMI deployment.

Effective Date

Liberty requests that this Tier 1 Advice Letter be effective as of September 18, 2025.

Tier Designation

Pursuant to General Order 96-B, and D.25-06-034, 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 October 8, 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 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:

Energy Division Tariff Unit
California Public Utilities Commission
September 18, 2025
Page 9

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;
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;
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



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) #: 272-E

Tier Designation: 1

Subject of AL: Building Decarbonization

Keywords (choose from CPUC listing): Compliance, Metering

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
D.25-06-034

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: 9/18/25

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
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: 562-805-2052
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	