



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

June 8, 2020

VIA EMAIL

**Advice Letter 145-E
(U 933-E)**

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

**Subject: Liberty Utilities (CalPeco Electric) LLC (U-933 E) – Mobile Home Park
Program Tariff Changes**

In compliance with Ordering Paragraph (“OP”) 9 of California Public Utilities Commission (“CPUC”) Decision (“D.”) 20-04-004, Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”) hereby submits revisions to its tariff sheets.

Purpose

In compliance with OP 9 of D.20-04-004, Liberty CalPeco requests approval to revise tariffs to establish a voluntary, mobile home park/manufactured housing community utility conversion program (“MHP Program”). Specifically, Liberty CalPeco is revising its Rule 23, *Mobile Home Park Conversion Program*, and Preliminary Statement 13.H, *Mobile Home Park Balancing Account*, to reflect changes to the MHP Program ordered in D.20-04-004. The revised tariff sheets are attached.

Tier Designation

Pursuant to OP 9 of D.20-04-004, this Advice Letter is submitted with a Tier 2 designation.

Effective Date

Liberty CalPeco requests that this Tier 2 advice filing become effective **June 8, 2020**.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or by email, any of which must be received no later than **June 29, 2020**, which is 20 days after the date of this filing. The protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. There is no restriction on who may file a protest. Protests should be mailed to:

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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 also should be sent via email and U.S. Mail to Liberty CalPeco at the addresses show 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: Dan.Marsh@libertyutilities.com

Notice

In accordance with General Order 96-B, Section 4.3, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list. The advice letter is also being sent to parties shown on the R.11-02-018 service list.

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

Sincerely,

/s/ Dan Marsh

Dan Marsh
Manager, Rates and Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC

cc: Liberty CalPeco Advice Letter Service List
R.11-02-18 Service List

Attachments

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

VIA EMAIL

gbinge@ktminc.com;
emello@sppc.com;
epoole@adplaw.com;
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bhodgeusa@yahoo.com;
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phanschen@mofo.com;
liddell@energyattorney.com;
cem@newsdata.com;
dietrichlaw2@earthlink.net;
ericj@eslawfirm.com;
clerk-recorder@sierracounty.ws;
plumascoco@gmail.com;
marshall@psln.com;
stephenhollabaugh@tdpud.org;
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mas@cpuc.ca.gov;
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tlg@cpuc.ca.gov;
dao@cpuc.ca.gov;
ljt@cpuc.ca.gov;
mmg@cpuc.ca.gov;
kjl@cpuc.ca.gov;
denise.tyrrell@cpuc.ca.gov;
fadi.daye@cpuc.ca.gov;
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ELECTRIC RULE 23

MOBILEHOME PARK CONVERSION PROGRAM

- A. PURPOSE: Pursuant to the California Public Utility Commission's (CPUC or Commission) Decision (D.)20-04-004, Liberty Utilities is offering a ten-year Mobilehome Park Conversion Program (MHP Program) for conversion from master-meet/submeter natural gas and/or electric service to direct service. Liberty Utilities will complete at least one MHP conversion per year. Subject to the requirements set forth in this Rule, all eligible submetered spaces (including both "To-the-Meter" and "Beyond-the-Meter"), and common use services within the entire MHP will be converted from master-metered electric distribution service to direct Liberty Utilities distribution and service (Distribution System). (T)
- B. APPLICABILITY: The MHP Program is available to all eligible MHPs within Liberty Utilities' service territory as defined in Section C. Recreational vehicle parks and spaces are not eligible for the MHP Program. (T)
- C. PROGRAM ELIGIBILITY
1. MHPs must meet all of the following criteria to be eligible for the MHP Program. Program eligibility does not guarantee acceptance into the program, nor does it guarantee conversion to direct service from Liberty Utilities.
 - a. Receive electricity through a single master-meter, own and operate the distribution system with associated sub-meters, and furnish electricity to residents.
 - b. Take electric service under one of the following rate schedules:
 - Electric Schedule D-1
 - Electric Schedule DM-1
 - c. Operate under a current and valid license from the governmental entity with relevant authority.
 - d. If operated on leased real property, the land lease agreement must continue for a minimum of 20 years.
 - e. Not be subject to an enforceable condemnation order and/or to a pending condemnation proceeding.

(Continued)

ELECTRIC RULE 23

MOBILEHOME PARK CONVERSION PROGRAM

(Continued)

2. MHP Owner/Operators who elect to participate in the MHP Program must comply with all general rules, rights and obligations as set forth in this Rule. In addition, MHP Program participants must complete and/or execute the following documents:

- The CPUC’s “Application for Conversion of Master Meter Service at Mobilehome Park or Manufactured Housing Community to Direct Service from Electric or Gas Corporation” [“CPUC’s Form of Intent”]; and
- The “Mobilehome Park Conversion Program Application” [“Utilities’ MHP Application”] (Form 14-0700); and
- The “Mobilehome Park Conversion Program Agreement” [“MHP Agreement”] (Form 14-0710).

D. MHP PROGRAM COMPONENTS

1. CPUC’s Form of Intent

CPUC’s Form of Intent will be accepted January 1, 2021, through March 31, 2021 (90-day period). The MHP Owner/Operator must complete and submit the CPUC’s Form of Intent concurrently to both the Safety Enforcement Division (SED) of the CPUC and Liberty Utilities. CPUC’s Form of Intent received after the 90-day period will be placed on a waiting list. (T)

a. Prioritization of CPUC’s Form of Intent

- 1) CPUC’s Form of Intent will be reviewed and prioritized as follows: (1) SED will prioritize MHPs that are gas only or dual system (gas and electric service), and (2) the California Department of Housing and Community Development (HCD) will prioritize MHPs that are electric only. MHPs whose Initial Applications are accepted and prioritized by SED and HCD will be considered pre-qualified.
- 2) Liberty Utilities will receive a list of pre-qualified MHP Initial Applications from SED and HCD. Liberty Utilities will then contact the MHPs with the highest priority to participate in the MHP program until the program goal is achieved. Liberty Utilities will undertake its best efforts to communicate and coordinate with other utilities, municipal entities, and/or water and telecommunications providers to maximize efficiencies where possible.

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Advice Letter No. 145-E

Issued by
Gregory S. Sorensen

Date Filed June 8, 2020

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MOBILEHOME PARK CONVERSION PROGRAM

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2. Utilities' MHP Application

- a. After an MHP has been preliminarily contacted by Liberty Utilities to participate in the MHP Program, the MHP Owner/Operator will be provided with the Utilities' MHP Application. The Utilities' MHP Application requests additional information that the MHP Owner/Operator must provide to enable Liberty Utilities to commence the engineering and planning process for the new MHP distribution system.
- b. Upon receipt of a completed Utilities' MHP Application and necessary documentation from the MHP Owner/Operator, Liberty Utilities will commence engineering and planning a new MHP distribution system.

3. MHP Agreement

- a. After Liberty Utilities has engineered and planned the new MHP distribution system and Liberty Utilities has received the name of the MHP's Contractor and the cost for the "Beyond-the-Meter" work, Liberty Utilities will prepare the MHP Agreement for signature.
- b. The conversion project will commence upon 1) the satisfactory resolution of any environmental, endangered species and/or cultural issues, 2) procurement of all required permits, and 3) payment for any applicable re-arrangements/relocation of facilities or addition of new electric facilities, 4) the execution of the MHP Agreement.

4. Construction

- a. Liberty Utilities will perform or select a qualified, licensed contractor to perform all necessary "To-the-Meter" construction, and/or electric work as set forth in this Rule, and the MHP Agreement.
- b. The MHP Owner/Operator selected Contractor will perform all necessary "Beyond-the-Meter" construction and/or electrical work as set forth in this Rule, and the MHP Agreement.

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MOBILEHOME PARK CONVERSION PROGRAM

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5. Cutover of Service

- a. Cutover to direct service from Liberty Utilities will occur only after the inspection and approval of the "Beyond-the-Meter" facilities by the appropriate jurisdictional authorities.
- b. The MHP Owner/Operator's MHP master-meter submetered discount will cease as described in the MHP Owner/Operator Responsibilities section of the MHP Agreement.
- c. MHP residents (tenants or owners of the Mobilehome) will become customers of Liberty Utilities and served in accordance with all applicable rates, rules and conditions set forth in Liberty Utilities' existing Tariffs, except as otherwise noted in this Rule.

6. Ownership of Facilities After Conversion

- a. Upon cutover to direct service, Liberty Utilities will own, operate, and maintain all of the "To-the-Meter" electric distribution and service systems within the MHP in accordance with all applicable rates, rules and conditions set forth in Liberty Utilities existing Tariffs.
- b. The MHP Owner/Operator or MH Owner shall own, operate and maintain all "Beyond-the-Meter" facilities in accordance with State and local jurisdictional codes and ordinances.
- c. Liberty Utilities shall have no liability for the MHP submetered system (referred to as legacy systems), or the "Beyond-the-Meter" infrastructure installed during conversion. The MHP Owner/Operator will hold harmless, defend and indemnify the Utility from all causes of action or claims arising from or related to these systems.

7. Safety

The MHP Owner/Operator and its Contractor participating in the MHP Program recognize and agree that safety is of paramount importance in the performance of the MHP Program and are solely responsible for performing the "Beyond-the-Meter" work in a safe manner and in accordance with the National Electric Code, Universal Plumbing Code and the Safety Section of the MHP Agreement.

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MOBILEHOME PARK CONVERSION PROGRAM

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8. Reimbursement to MHP Owner/Operator

Liberty Utilities will reimburse the MHP Owner/Operator for reasonable and prudently incurred expenses for “Beyond-the-Meter” construction covered by the MHP Program. These expenditures shall not include costs relating to any modification or retrofit of the Mobilehome, costs associated with “Beyond-the-Meter” cost to serve common areas, service relocations, rearrangements, upgrades, or other service modification(s) by the MHP Owner/Operator and/or by the MHP residents beyond what is being provided by the MHP Program. The amount eligible for reimbursement will be stated in the MHP Agreement.

9. Payment to Liberty Utilities

- a. If applicable, any costs associated with service relocations, rearrangements and upgrades that are not covered by the MHP Program or in excess of what the MHP Program requires must be paid in full to Liberty Utilities prior to or included with the submittal of the MHP Agreement in order for the construction phase to begin.

E. INTERACTION WITH OTHER TARIFFS

1. MHP Residents

Upon conversion, MHP residents will be subject to Liberty Utilities’ effective Tariffs, which can be found at:

<https://california.libertyutilities.com/truckee/residential/rates-and-tariffs/electrical.html#navbar-rates-and-tariffs-residential>, with the following exceptions:

(T)
|
(T)

- 1) Electric Rules 7– Deposit: Existing MHP residents who become customers of Liberty Utilities through the MHP Program will be deemed “grandfathered” into their Liberty Utilities service accounts and on a one-time basis, fees associated with new customer credit checks and service deposits will be waived. This one-time waiver is authorized by D.14-03-021. MHP residents will still be subject to the service shut-off provisions under Electric Rules 11.

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MOBILEHOME PARK CONVERSION PROGRAM

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- 2) CARE/FERA Program – Existing MHP residents who participate in the California Alternate Rates for Energy (CARE) and/or Family Electric Rate Assistance (FERA) programs through the MHP master-meter/submeter distribution system and become customers of Liberty Utilities through the MHP Program will be deemed “grandfathered” into the respective program without having to recertify or reapply as long as the name of the customer for the new service account matches that of the name of the participant in the CARE/FERA program. This will be a one-time exception to the respective CARE/FERA Rules at the time of the service conversion.
- 3) Medical Baseline Allowance – Existing MHP residents who receive a medical baseline allowances through the MHP master-meter/submeter distribution system and become customers of Liberty Utilities through the MHP Program will be deemed “grandfathered” and will continue to receive the same medical baseline allowances without having to recertify or reapply as long as the participant who is receiving the medical baseline allowance still resides at the residence. This will be a one-time exception to the Medical Baseline Rules at the time of the service conversion.

2. MHP Owner/Operator(s)

Utility service provided by Liberty Utilities to the MHP Owner/Operator(s) is subject to Liberty Utilities’ effective Tariffs, which can be found at:

<https://california.libertyutilities.com/truckee/residential/rates-and-tariffs/electrical.html#navbar-rates-and-tariffs-residential>, with the following exceptions: (T)

- a. Electric Rules 15 – Distribution Extension: Because Liberty Utilities will design and install the new Distribution Line/Main Extension, at no cost to the MHP Owner/Operator, sections in Electric Rules 15 that cover applicant responsibilities or options are not applicable to MHP Owner/Operator while participating in the MHP Program. This may include, but is not limited to applicants’: responsibilities; allowances; contributions or advances; refunds; and design and installation options.
- b. Electric Rules 16 – Service Extension: Because Liberty Utilities will design and install the new Service Extension, at no cost to the MHP Owner/Operator, sections in Electric Rules 16 that cover applicant responsibilities or options are not applicable to MHP Owner/Operators while participating in the MHP Program. This may include, but is not limited to applicants’: installation options, allowances and payment.

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MOBILEHOME PARK CONVERSION PROGRAM

(Continued)

Because space for metering equipment and its associated working space are very limited in MHPs, the requirements of the Meter Location provision of Electric Rule 16 may be waived by the utility during MHP Program participation. Under the MHP Program, all meters and associated metering equipment shall be located at a protected location on Applicant’s Premises as designated and approved by Liberty Utilities.

F. DEFINITIONS and ACRONYMNS

Certain specific terms used in this Rule are defined below. Additional definitions for more widely used terms in Liberty Utilities’ tariffs are also found in Electric Rule 1.

1. MHP AGREEMENT – The Mobilehome Park Conversion Agreement (Form 12-0710).
2. BEYOND-THE METER (Electric) – Electric “Beyond-the-Meter” facilities include the electric equipment to establish the Service Delivery Point as identified in the “Required Service Equipment” of Electric Rule 16, along with additional conductors, infrastructure and substructures necessary to complete the extension of facilities from the Service Delivery Point (e.g. Electric Metering Facility to the point of connection (e.g. power supply cord or hard wire feeder assembly) for the mobile home. The Utility will not be responsible for any part of the “point of connection” as noted above, including labor, or any work that would require an alteration permit. Beyond-the-Meter facilities are solely the responsibility of the MHP Owner/Operator or the mobilehome owner (MH Owner). The power supply cord or hard wire feeder assembly will continue to be part of the mobilehome and be the responsibility of the mobilehome owner.
3. COMMON USE AREA – Designated building(s), areas, or facilities within an MHP that is (are) intended to be used by all the park residents or the MHP Owner/Operator. Energy costs for servicing the common area are paid for by the MHP Owner/Operator.
4. CPUC’s FORM OF INTENT – The CPUC’s Application for Conversion of Master-Meter Service at Mobilehome Park or Manufactured Housing Community to Direct Service from Electric or Gas Corporation (Appendix D of D.20-04-004). (T)
5. HCD - California Department of Housing and Community Development –HCD administers and enforces uniform statewide standards which assure owners, residents and users of mobilehome parks protection from risks to their health and safety.

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MOBILEHOME PARK CONVERSION PROGRAM

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6. MANUFACTURED HOUSING COMMUNITY – Any area or tract of land where two or more manufactured home lots are rented or leased, held out for rent or lease, or were formerly held out for rent or lease and later converted to a subdivision, cooperative, condominium, or other form of resident ownership, only to accommodate the use of manufactured homes constructed pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974.
7. MOBILEHOME – See Rule 1.
8. MOBILEHOME PARK – See Rule 1.
9. MOBILEHOME SPACE (MH-Space) – Designated area within a Mobilehome Park that is owned, rented, or held out for rent, to accommodate a mobilehome used for human habitation.
10. MOBILEHOME PARK OWNER/OPERATOR (MHP Owner/Operator) – The party that has legal obligation for the MHP.
11. MHP RESIDENT – A person who has tenancy in a mobilehome park under a rental agreement or who lawfully occupies a mobilehome.
12. SED – California Public Utilities Commission’s Consumer Safety and Enforcement Division: The SED has safety oversight of electric and communications facilities, natural gas and propane gas systems, railroads, light rail transit systems, and highway/rail crossings, licensing, consumer protection, and safety oversight of motor carriers of passengers, household goods, and water vessels, and regulatory oversight of hot air balloons and some air carriers.
13. SERVICE DELIVERY POINT (Electric) – Where Liberty Utilities’ Service Facilities are connected to either Applicant’s conductors or other service termination facility designated and approved by Liberty Utilities.

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MOBILEHOME PARK CONVERSION PROGRAM

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14. Liberty Utilities TO-THE-METER (Electric) – Electric “To-the-Meter” facilities include all electrical facilities (e.g. cable, connectors, poles, transformers, switches, and meters) including the conduit and substructures necessary to complete the electrical distribution line and service extensions to the Service Delivery Point, and will be owned, maintained and operated by Liberty Utilities.
15. UTILITIES’ MHP APPLICATION – The Joint Utilities Mobilehome Park Conversion Application (Form 12-0700).

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H. MOBILE HOME PARK BALANCING ACCOUNT (MHPBA)

- i. **PURPOSE:** The purpose of the Mobile Home Park Balancing Account (MHPBA) is to record and recover the actual incurred costs of implementing the voluntary program to convert the electric master-meter/submeter service at mobile home parks and manufactured housing communities to direct service by Liberty Utilities, pursuant to Decision (D.) 14-03-021 and retained in D.20-04-004. The costs associated with the accounting entries in the MHPBA shall include incremental incurred expenses and both “to the meter” and “beyond the meter” costs. Pursuant to Ordering Paragraph (OP) 8 of D.14-03-021, the incurred expenses shall be entered into the program balancing account for recovery in the first year following the cut over of service subject to reasonableness review. Actual construction costs for each MHP conversion shall be entered into a balancing account and recovered the year immediately following service cut over for that MHP. Reasonableness review of “to the meter” cost will occur in Liberty’s General Rate Case (GRC) proceedings, where these costs are included into the base rates. The review of the “beyond the meter” costs will occur in the first GRC after service cut over. (T)
- ii. **PROCEDURE:** Liberty Utilities shall maintain the MHPBA by making entries to this account at the end of each month as follows:
 - (1) A debit entry equal to the incremental incurred expenses; (T)
 - (2) A debit entry equal to the capital-related revenue requirement, excluding Franchise Fees and Uncollectible Allowance Expense (FF&U), related to the “to the meter” capital costs incurred. Capital-related revenue requirements include depreciation expense, the return on investment at a rate equivalent to Liberty’s current authorized return on rate base, federal and state income taxes, and property taxes associated with the costs of installed equipment; (T)
 - (3) A debit entry equal to the revenue requirement, excluding FF&U, related to the “beyond the meter” costs incurred. The revenue requirement will include amortization expense, return on investment, and federal and state income taxes, associated with the costs of installed equipment. The “beyond the meter” costs are recorded as a regulatory asset and will be amortized over ten years, with a return on investment at a rate equivalent to Liberty’s current authorized return on rate base;
 - (4) A debit or credit entry to transfer the balance to or from any other accounts as approved by the Commission; and

(continued)

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H. MOBILE HOME PARK BALANCING ACCOUNT (MHPBA)

(5) An entry equal to the interest on the average balance in this account at the beginning of the month and the balance in this account after the above entries at a rate equal to one- twelfth the interest rate on three-month Commercial Paper (T) for the previous month, as reported in the Federal Reserve Statistical Release H.15, or its successor.

iii. APPLICABILITY

The MHPBA shall apply to all customer classes, except for those schedules or contracts specifically excluded by the Commission.

iv. CHANGES IN RATES

Costs recorded in the MHPBA may be recovered in rates only after a request by Liberty, a showing of reasonableness, and approval by the Commission. Such a request may be made by formal application specifically for that purpose, by inclusion in a subsequent general rate case, or other rate setting request.

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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: Dan Marsh
 Phone #: 562-805-2083
 E-mail: Dan.Marsh@libertyutilities.com
 E-mail Disposition Notice to: Dan.Marsh@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) #: 145-E

Tier Designation: 2

Subject of AL: Liberty Utilities (CalPeco Electric) LLC (U-933 E) – Mobile Home Park Program Tariff Changes

Keywords (choose from CPUC listing): Compliance, Mobile Home Parks

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-04-004

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: 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: 6/8/20

No. of tariff sheets: 11

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 23 - Mobile Home Park Conversion Program
Preliminary Statement 13.H - Mobile Home Park Balancing Account

Service affected and changes proposed¹: Revisions to program based on D.20-04-004

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: Dan Marsh
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: 562-805-2083
Facsimile (xxx) xxx-xxxx:
Email: Dan.Marsh@libertyutilities.com

Name:
Title:
Utility Name:
Address:
City: State: California
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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	