



Liberty Utilities (CalPeco Electric) LLC
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June 14, 2024

VIA EMAIL ONLY

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**Advice Letter 243-E
(U 933-E)**

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

Subject: Income Graduated Fixed Charge Memorandum Account

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.” 24-05-028, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 1 Advice Letter to establish the Income Graduated Fixed Charge (“IGFC”) Memorandum Account (“IGFCMA”).

Purpose

Pursuant to Ordering Paragraphs (“OP”) 1 and 9 of D. 24-05-028, Liberty submits this Tier 1 Advice Letter to establish the IGFCMA, which will track and record the incremental implementation and administration costs of income-graduated fixed charges. While OP 1 includes the implementation of an IGFC Balancing Account, Liberty is not requesting an IGFC Balancing Account at this time because, pursuant to OP 11 of D.24-50-028, Liberty will “record any over- or under-collection of revenues by income-graduated fixed charges as a separate line-item in its existing Base Revenue Requirement Balancing Account.”

Background

On June 30, 2022, Assembly Bill (AB) 205, Stats. 2022, Ch. 61 was signed into law. On July 14, 2022, the Commission issued an Order Instituting Rulemaking to establish demand flexibility policies and modify electric rates to advance the following objectives:

- a) enhance the reliability of California’s electric system;
- b) make electric bills more affordable and equitable;
- c) reduce the curtailment of renewable energy and greenhouse gas emissions associated with meeting the state’s future system load;
- d) enable widespread electrification of buildings and transportation to meet the state’s climate goals;
- e) reduce long term system costs through more efficient pricing of electricity; and;
- f) enable participation in demand flexibility by both bundled and unbundled customers.

Proposed New Tariff

Preliminary Statement, Income Graduated Fixed Charge Memorandum Account (IGFCMA)

Pursuant to D.24-05-028, issued May 9, 2024, the Income Graduated Fixed Charge Memorandum Account (IGFCMA) will record implementation costs and incremental administration costs of income-graduated fixed charges.

The disposition of any balance in this account will be addressed in a future Application.

Tier Designation

This advice letter is being submitted with a Tier 1 designation, per D.24-05-028.

Effective Date

Liberty requests an effective date of June 14, 2024.

Protests

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile, or by email, any of which must be received no later than July 4, 2024, 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 and U.S. Mail 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: 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 lists. Address change requests to Liberty's GO 96-B service list should be directed by electronic mail to:

AnnMarie.Sanchez@LibertyUtilities.com.

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California Public Utilities Commission
June 14, 2024
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For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at ProcessOffice@cpuc.ca.gov.

If additional information is required, please do not hesitate to contact me at Dan.Marsh@libertyutilities.com.

Respectfully submitted,

LIBERTY

/s/ Dan Marsh

Dan Marsh
Senior Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List
R.22-07-005 Service List

PRELIMINARY STATEMENT

(Continued)

13. MEMORANDUM ACCOUNTS (Continued)

V. Income Graduated Fixed Charge Memorandum Account (IGFCMA)

(N)

Pursuant to the Commission Decision 24-05-028, issued May 9, 2024, the Income Graduated Fixed Charge Memorandum Account (IGFCMA) will record implementation costs and incremental administration costs of income-graduated fixed charges.

1. PURPOSE

The purpose of the Income Graduated Fixed Charge Memorandum Account is to track incremental costs incurred for implementing income-graduated fixed charges not otherwise included in Liberty's revenue requirement.

2. APPLICABILITY

The IGFCMA applies to all rate schedules unless otherwise excluded by the commission.

3. ACCOUNTING PROCEDURES

Liberty shall maintain the Income Graduated Fixed Charge Memorandum Account by making entries at the end of each month as follows:

- a. A debit entry shall be made to the Income Graduated Fixed Charge Memorandum Account at the end of each month to record the incremental costs associated with the implementation of income-graduated fixed charges.
- b. Interest shall accrue to the Income Graduated Fixed Charge Memorandum Account on a monthly basis by applying a rate equal to one-twelfth of the three-month Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and the end-of-month balances.

4. EFFECTIVE DATE

The Income Graduated Fixed Charge Memorandum Account shall be effective on June 14, 2024.

5. DISPOSITION

Disposition of amounts recorded in the Income Graduated Fixed Charge Memorandum Account shall be determined in a subsequent rate-setting filing authorized by the Commission.

(N)

Advice Letter No.	<u>AL 243-E</u>	Issued by <u>Lindsay Maruncic</u> Name	Date Filed:	<u>June 14, 2024</u>
Decision No.	<u>D.24-05-028</u>	<u>President</u> Title	Effective Date:	<u>June 14, 2024</u>
			Resolution No.	<u></u>

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California
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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R2207005 - OIR ADVANCE DEMAND F
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: JUNE 13, 2024

[Download the Comma-delimited File](#)
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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 #: 530-721-2435

E-mail: Dan.Marsh@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) #: 243-E

Tier Designation: 1

Subject of AL: Income Graduated Fixed Charge Memorandum Account

Keywords (choose from CPUC listing): Memorandum Account

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.24-05-028

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: 6/14/24

No. of tariff sheets: 1

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: Income Graduated Fixed Charge Memorandum Account

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:

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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	