



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

April 22, 2024

**VIA EMAIL ONLY**  
**EDTariffUnit@cpuc.ca.gov**

**Advice Letter No. 236-E-A**  
**(U 933-E)**

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

**SUBJECT: 2023 Affiliate Transaction Compliance Plan**

**Purpose**

Liberty Utilities (CalPeco Electric) LLC (U 933 E) (“Liberty”) hereby submits its 2023 Affiliate Transaction Compliance Plan (“Compliance Plan”) in accordance with the California Public Utilities Commission’s (“Commission”) Decision (D.) 97-12-088, as amended by D.98-08-035, D.98-12-075, D.99-09-002, and D.02-02-046. The attached Compliance Plan presents the most current information for Liberty regarding its affiliate transaction compliance efforts. This filing serves as an update to the 2023 Affiliate Transaction Compliance Plan previously filed.

**Background**

The Commission’s affiliate transaction rules for electric utilities (“Affiliate Rules”) were initially adopted in D.97-12-088, and modified by D.98-08-035, D.98-12-075, D.99-09-002, and D.02-02-046. Liberty is an “electric utility” under the Affiliate Rules and, pursuant to Rule II.B, the Affiliate “Rules apply to all utility transactions with affiliates engaging in the provision of a product that uses electricity, or the provision of services that relate to the use of electricity,” unless otherwise exempted from the Affiliate Rules.

**Compliance Plan**

This Compliance Plan is responsive to Rule VI.A and describes the manner in which Liberty currently has programs and procedures in place to comply with the Affiliate Rules by itself and its affiliates. Liberty believes that the compliance actions set forth in the attached revised Compliance Plan are consistent and comply fully with the Affiliate Rules. Liberty remains committed to upholding both the letter and spirit of the Rules, and respectfully requests that the Commission approve its 2023 Compliance Plan.

**Effective Date**

In accordance with General Order 96-B, General Rule 7.6.1 and Energy Industry Rule 5.1, Liberty submits this Tier 1 Advice Letter with an effective date of July 1, 2024.

**Notice**

In accordance with General Order 96-B, Section 4.4, a copy of this Advice Letter has been served electronically to the entities shown on the service lists for GO 96-B and R.97-04-011,

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California Public Utilities Commission  
March 12, 2024  
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I.97-04-012, and R.98-04-009, copies of which are attached. The Compliance Plan referenced herein is being provided to the Energy Division Staff only. Other entities may request a copy of the Compliance Plan by sending an email to: [Alex.Colteryahn@libertyutilities.com](mailto:Alex.Colteryahn@libertyutilities.com).

**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 April 1, 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, 4<sup>th</sup> Floor  
San Francisco, CA 94102-3298  
Facsimile: (415) 703-2200  
Email: [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

The protest should be sent via email and U.S. Mail (and by facsimile, if possible) 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](mailto:CaseAdmin@libertyutilities.com)

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

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/ Dan W. Marsh

Dan W. Marsh  
Senior Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List  
CPUC Service Lists R.97-04-011/I.97-04-012 and R.98-04-009 (Advice Letter Only)

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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christopher.westling@cpuc.ca.gov;  
sletton@cityofslt.us



# 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) #: 236-E-A

Tier Designation: 1

Subject of AL: 2023 Affiliate Transaction Compliance Plan

Keywords (choose from CPUC listing): Affiliate

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.97-12-088

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: 7/1/24

No. of tariff sheets: 0

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:

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Dan Marsh  
Title: Senior Manager, Rates and Regulatory Affairs  
Utility Name: Liberty Utilities (CalPeco Electric) LLC  
Address: 9750 Washburn Road  
City: Downey State: California  
Telephone (xxx) xxx-xxxx: 530-721-2435  
Facsimile (xxx) xxx-xxxx:  
Email: Dan.Marsh@libertyutilities.com

Name: AnnMarie Sanchez  
Title: Coordinator  
Utility Name: Liberty Utilities (California)  
Address: 9750 Washburn Road  
City: Downey State: California  
Telephone (xxx) xxx-xxxx: 562-923-0711  
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	