



Liberty Utilities (CalPeco Electric) LLC  
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December 5, 2022

**VIA EMAIL ONLY**

***EDTariffUnit@cpuc.ca.gov***

**Advice Letter 206-E  
(U 933-E)**

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

**Subject: Submetering Protocol Implementation Plan and Tariff Updates**

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.”) 22-08-024, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 2 advice letter requesting approval of its Submetering Protocol Implementation Plan and revisions to all relevant existing tariffs.

**Purpose**

Pursuant to Ordering Paragraph (“OP”) 3 of D.22-08-024, Liberty submits this Tier 2 advice letter to revise relevant tariffs, and propose a Submetering Protocol Implementation Plan.<sup>1</sup>

**Background**

On December 19, 2018, the Commission issued an Order Instituting Rulemaking (“OIR”) to “Continue the Development of Rates and Infrastructure for Vehicle Electrification” (“DRIVE”).<sup>2</sup> One of the purposes of the DRIVE OIR was for Energy Division Staff to develop and establish a Transportation Electrification Framework (“TEF”), to help guide policies and programs supporting California’s Zero Emission Vehicle (“ZEV”) infrastructure. On February 3, 2020, a ruling requesting feedback on the draft TEF was issued. Liberty provided opening comments for the TEF staff proposal draft, Sections 7 and 8, which addressed submetering among other things, on July 14, 2020.

Issues before the Commission within the scope of the proceeding included policies to support submetering and billing for ZEVs.<sup>3</sup> D.22-08-024 considered comments filed in 2020 and 2021, resolving issues regarding PEV Submetering Protocol, Electric Vehicle Service Equipment

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<sup>1</sup> D.22-08-024 at p. 43.

<sup>2</sup> R.18-12-006.

<sup>3</sup> The Assigned Commissioner’s Scoping Memo and Ruling, issued on May 2, 2019.

communication protocols, and implementation and timeline. The authorization to open memorandum accounts for tracking specific costs related to the implementation of submetering requirements was proposed and discussed in comments and approved in D.22-08-024. On September 2, 2022, Liberty filed Advice Letter 195-E to establish the Submetering Protocol Implementation Memorandum Account (SPIMA) to track and record the incremental costs associated with implementing the Plug-in Electric Vehicle Submetering Protocol (PEVSP), to be reviewed for reasonableness and cost recovery in its next general rate case. Liberty's SPIMA advice letter was approved as of October 12, 2022.

### **Proposed Tariff Revisions**

Pursuant to D.22-08-024, OP 3, Liberty is updating its electric rules to implement the adopted Plug-in Electric Vehicle Submetering Protocol. The revised tariff sheets are provided in this advice letter as Attachment A.

### **Proposed Submetering Protocol Implementation Plan**

Included in this advice letter as Attachment B is Liberty's PEVSP Implementation Plan containing a timeline to modify Liberty's billing system to incorporate the Plug-in Electric Vehicle Submetering Protocol, the timelines and process for resolving billing disputes, the estimated costs associated with implementing the requirements of D.22-08-024, and a standardized data format and transfer protocol to share data between an electric vehicle service provider/meter data management agent and Liberty.

### **Tier Designation**

Pursuant to General Order ("GO") 96-B, and D.22-08-024, OP. 3, this advice letter is submitted with a Tier 2 designation.

### **Effective Date**

Liberty requests an effective date of January 4, 2023.

### **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 December 25, 2022, 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](mailto:edtariffunit@cpuc.ca.gov)

Energy Division Tariff Unit  
California Public Utilities Commission  
December 5, 2022  
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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](mailto: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](mailto:AnnMarie.Sanchez@LibertyUtilities.com).

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](mailto:ProcessOffice@cpuc.ca.gov).

If additional information is required, please do not hesitate to contact me at [Cindy.Fisher@libertyutilities.com](mailto:Cindy.Fisher@libertyutilities.com).

Respectfully submitted,

**LIBERTY**

*/s/ Cynthia Fisher*

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Cynthia Fisher  
Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List  
R.18-12-006 Service List

**VIA EMAIL**

gbinge@ktminc.com;  
emello@sppc.com;  
epoole@adplaw.com;  
cem@newsdata.com;  
rmccann@umich.edu;  
sheila@wma.org;  
abb@eslawfirm.com;  
cbk@eslawfirm.com;  
bhodgeusa@yahoo.com;  
chilen@nvenergy.com;  
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;  
gross@portersimon.com;  
mccluretahoe@yahoo.com;  
catherine.mazzeo@swgas.com;  
Theresa.Faegre@libertyutilities.com;  
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bcragg@goodinmacbride.com;  
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edtariffunit@cpuc.ca.gov;  
jrw@cpuc.ca.gov;  
rmp@cpuc.ca.gov;  
jaime.gannon@cpuc.ca.gov;  
mas@cpuc.ca.gov;  
txb@cpuc.ca.gov;  
efr@cpuc.ca.gov;  
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;  
winnie.ho@cpuc.ca.gov;  
usrb@cpuc.ca.gov;  
Rob.Oglesby@energy.ca.gov;  
stevegreenwald@dwt.com;  
vidhyaprabhakaran@dwt.com;  
judypau@dwt.com;  
dwtcpucdockets@dwt.com;  
patrickferguson@dwt.com;  
travis.ritchie@sierraclub.org;  
dan.marsh@libertyutilities.com;  
sharon.yang@libertyutilities.com;  
ginge@regintl.com

**SCHEDULE NO. D-1**

**DOMESTIC SERVICE**

**APPLICABILITY**

This rate schedule is applicable to all domestic power service to separately metered single family dwellings and individual living units of multi-unit complexes, where such units are metered by the Utility. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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**TERRITORY**

Entire California Service Area.

**RATES**

Customer Charge

Per meter, per month \$9.67

Energy Charges (Per kWh)

A. For Quantities up to and Including Baseline Quantities (See Special Condition 2):

Distribution	Generation 1	Vegetation 2	SIP 4	PPP 5	BRRBA 7	Total	
\$0.08197	\$0.04371	\$0.00563	\$0.00072	\$0.00364	\$0.00185	(R) \$0.13752	(R)

B. For Quantities in Excess of Baseline Quantities (See Special Condition 2):

\$0.08197	\$0.06751	\$0.00563	\$0.00072	\$0.00364	\$0.00185	(R) \$0.16132	(R)
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Other Energy Charges (Per kWh)

Surcharges<sup>8</sup> \$0.00160

Late Charge

1% on any amount 45 days in arrears from previous billings.

Minimum Charge

The per meter, per month Customer Charge.

1. Generation – Charge includes the Energy Cost Adjustment Clause Billing Factor as described in the Preliminary Statement, Number 6.
2. Vegetation – Charge to recover amounts in the Vegetation Management Balancing Account, as described in the Preliminary Statement, Number 18.
3. CEMA – Charge to recover amounts in the Catastrophic Event Memorandum Account as approved in D.16-12-024 and as described in the Preliminary Statement, Number 13.A.
4. SIP – Charge to recover the costs of the Solar Initiative Program as described in the Preliminary Statement, Number 21.
5. PPP – Charge to recover Public Purpose Programs funding energy efficiency and low-income assistance programs described in Preliminary Statement, Numbers 10, 17 and 19.
6. GRCMA – Charge to recover amounts in the General Rate Case Memorandum Account as described in the Preliminary Statement, Number 13.1.
7. BRRBA – Charge to recover amounts in the Base Revenue Requirement Balancing Account as described in the Preliminary Statement Number 8.
8. Surcharges – Charge to recover the Public Utilities Commission Reimbursement Surcharge as described in Rate Schedule RF and the Energy Commission Surcharge that is established by the California Energy Commission.

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Advice Letter No. 206-E Issued by Edward N. Jackson Date Filed: December 5, 2022  
 Name  
 Decision No. D.22-08-024 Title President Effective Date: January 4, 2023  
 Resolution No. \_\_\_\_\_

**SCHEDULE NO. CARE**

**CARE DOMESTIC SERVICE**

**APPLICABILITY**

This rate schedule is applicable to all domestic power service to separately metered single family dwellings and individual living units of multi-unit complexes, where such units are metered by the Utility, and where the Customer is classified as a permanent Customer who meets the provisions of Special Condition 3 of this rate schedule. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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**TERRITORY**

Entire California Service Area.

**RATES**

Customer Charge – Non TOU (Otherwise Applicable Schedule D-1)

Per meter, per month \$7.74

Energy Charges – Non TOU (Per kWh)

A. For Quantities up to and Including Baseline Quantities (See Special Condition 2)

Distribution	Generation 1	Vegetation 2	SIP 4	PPP 5	BRRBA 7	Total
\$0.05279	\$0.04371	\$0.00563	\$0.00072	\$0.00211	\$0.00185 (R)	\$0.10681 (R)

B. For Quantities in Excess of Baseline Quantities (See Special Condition 2)

\$0.04803	\$0.06751	\$0.00563	\$0.00072	\$0.00211	\$0.00185 (R)	\$0.12585 (R)
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Customer Charge – TOU (Otherwise Applicable Schedule TOU D-1)

Per meter, per month \$12.21

Energy Charges – TOU (Per kWh)

	Distribution	Generation 1	SIP 4	PPP 5	BRRBA 7	Total
<b>Winter</b>						
On-Peak	\$0.04788	\$0.07867	\$0.00072	\$0.00211	\$0.00185 (R)	\$0.13123 (R)
Mid-Peak	\$0.04856	\$0.06485	\$0.00072	\$0.00211	\$0.00185 (R)	\$0.11809 (R)
Off-Peak	\$0.05697	\$0.02955	\$0.00072	\$0.00211	\$0.00185 (R)	\$0.09120 (R)
<b>Summer</b>						
On-Peak	\$0.04850	\$0.07526	\$0.00072	\$0.00211	\$0.00185 (R)	\$0.12844 (R)
Off-Peak	\$0.05747	\$0.02752	\$0.00072	\$0.00211	\$0.00185 (R)	\$0.08967 (R)

Other Energy Charges (Per kWh)

Surcharges<sup>8</sup> \$0.00160

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Advice Letter No.	<u>206-E</u>	Issued by <u>Edward N. Jackson</u> Name	Date Filed:	<u>December 5, 2022</u>
Decision No.	<u>D.22-08-024</u>	<u>President</u> Title	Effective Date:	<u>January 4, 2023</u>
			Resolution No.	<u></u>

**SCHEDULE NO. DS-1**

**MULTI-UNIT DOMESTIC SERVICE SUBMETERED**

**APPLICABILITY**

This rate schedule is applicable to all domestic power service to multiple living units on a single premises, all served by a single meter, and which are separately sub-metered by the Customer, in accordance with Rule 19. This schedule applies to mobile home parks as defined in Rule 1 and to Qualifying RV Parks as such term is defined in Special Condition 3.

Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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This rate schedule is closed to new installations of multi-family accommodations, mobile home park accommodations and manufactured housing communities since January 1, 1997. This rate schedule is also closed to additions to existing installations and therefore no sub-meters can be added to existing master-metered locations under this rate schedule, except that master- meter/sub-meters currently being served under this rate schedule will be allowed to continue on that schedule following a change of ownership provided that no additional sub-meters are added for inclusion in the master-metered rate schedule. This rate schedule remains open for Qualifying RV Parks.

**TERRITORY**

Entire California Service Area.

**RATES**

The rates of the separately metered, single family dwellings, Schedule No. D-1, Domestic Service, shall apply, except as adjusted as follows:

Energy Charge:

The baseline quantity to be billed under rates designated as applicable to Tier I Baseline Quantities shall be determined by multiplying the applicable baseline quantity determined in Special Condition 7, by the number of sub-metered accommodations occupied by residents for whom the accommodation is their permanent place of residence in (1) multiple living units on a single premises; (2) residential Mobile Homes in a Residential Mobile Home Park; or (3) Qualifying RV Units in a Qualifying RV park; plus any eligible Medical Baseline Allocations.

If any sub-metered accommodation qualifies for California Alternate Rates (“CARE”) rate assistance as set forth in Schedule No. CARE, the total metered usage shall be prorated among the applicable CARE and the non-CARE usage according to the proportion of CARE qualifying and CARE non-qualifying accommodations. The CARE Baseline Quantity to be billed under CARE baseline rates shall be determined by multiplying the applicable Baseline Quantity determined in Special Condition 7 by the number of sub-metered CARE qualifying accommodations in (1) multiple living units on a single premises; (2) residential Mobile Homes in a Residential Mobile Home Park; or (3) Qualifying RV Units in a Qualifying RV park; plus any eligible Medical Baseline Allocations. All quantities in excess of CARE Baseline Quantities, if any, shall be billed at the CARE Quantities in Excess of Baseline Quantities rates. Such discounted CARE rates are listed in Schedule No. CARE.

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Advice Letter No.	<u>206-E</u>	Issued by <u>Edward N. Jackson</u> <small>Name</small>	Date Filed:	<u>December 5, 2022</u>
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			Resolution No.	<u></u>

**SCHEDULE NO. DM-1**

**MULTI-UNIT DOMESTIC SERVICE NOT SUBMETERED**

**APPLICABILITY**

This schedule is applicable to all single phase domestic power service to multiple living units on a single premises, all served by a single meter, and which are not separately sub-metered by the Customer, in accordance with Rule 18. This schedule also applies to residential hotels as defined in Rule 1 and to residential RV parks which rent at least 50 percent of their spaces on a month-to-month basis for at least 9 months of the year to RV units used as permanent residences.

Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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This rate schedule is closed after February 4, 1978, to new installations and additions to existing installations and therefore no sub-meters can be added to existing master-metered locations under this rate schedule, except that master-meter/sub-meters currently being served under one of these schedules will be allowed to continue on that schedule following a change of ownership provided that no additional sub-meters are added for inclusion in the master-metered rate schedule. This rate schedule remains open for Qualifying Residential Hotels and Qualifying RV Parks as defined in Special Conditions 3 and 4, respectively.

**TERRITORY**

Entire California Service Area.

**RATES**

The rates of the separately metered, single family dwellings, Schedule No. D-1, Domestic Service, shall apply, except as adjusted as follows:

**Energy Charge**

The baseline quantity to be billed under rates designated as applicable to Tier I Baseline Quantities shall be determined by multiplying the applicable baseline quantity determined in Special Condition 8, by the number of single-family accommodations in (1) multiple living units on a single premises; (2) Qualifying Residential Units in a Residential Hotel; or (3) Qualifying RV Units in a Qualifying RV park; plus any eligible Medical Baseline Allocations.

**Minimum Charge**

The Minimum Charge shall be the same as set forth in Schedule No. D-1.

**SPECIAL CONDITIONS**

- 1. Seasonal Service. For customers who use service for only part of the year, this schedule is applicable only on an annual contract.

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Advice Letter No.	<u>206-E</u>	Issued by <u>Edward N. Jackson</u> <small>Name</small>	Date Filed:	<u>December 5, 2022</u>
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**SCHEDULE NO. A-1**

**SMALL GENERAL SERVICE**

**APPLICABILITY**

This schedule is applicable to all non-domestic service where demand is less than fifty (50) kilowatts and no other schedule is specifically applicable. This schedule is applicable to service for agricultural irrigation (Schedule No. PA, Optional Interruptible Irrigation Service) for the billing periods December 1 through the end of February. Non-profit group living facilities taking service under this schedule may be eligible for a 20% low-income rate discount on their bill, if such facilities qualify to receive service under the terms and conditions of Schedule EXPCARE. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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**TERRITORY**

Entire California Service Area.

**RATES**

Customer Charge

Per meter, per month \$17.38

Energy Charges (Per kWh)

A. Rates that are applicable to Customers where demand has not exceeded twenty (20) kilowatts for any three (3) months during the preceding twelve (12) months. Applicability criteria are set forth in Special Condition 5.

Distribution	Generation 1	Vegetation 2	SIP 4	PPP 5	BRRBA 7	Total
\$0.09335	\$0.06142	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	\$0.19600 (R)

B. Rates that are applicable to all other Customers not meeting applicability criteria set forth in Special Condition 5.

\$0.09335	\$0.06142	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	\$0.19600 (R)
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Other Energy Charges (Per kWh)

Surcharges \$0.00160

1. Generation – Charge includes the Energy Cost Adjustment Clause Billing Factor as described in the Preliminary Statement, Number 6.  
 2. Vegetation – Charge to recover amounts in the Vegetation Management Balancing Account, as described in the Preliminary Statement, Number 18.  
 3. CEMA – Charge to recover amounts in the Catastrophic Event Memorandum Account as approved in D16-12-024 and as described in the Preliminary Statement, Number 13.A.  
 4. SIP – Charge to recover the costs of the Solar Initiative Program as described in the Preliminary Statement, Number 21.  
 5. PPP – Charge to recover Public Purpose Programs funding energy efficiency and low income assistance programs described in Preliminary Statement, Numbers 10, 17 and 19.  
 6. GRCMA – Charge to recover amounts in the General Rate Case Memorandum Account as described in the Preliminary Statement, Number 13.1.  
 7. BRRBA – Charge to recover amounts in the Base Revenue Requirement Balancing Account as described in the Preliminary Statement Number 8.  
 8. Surcharges – Charge to recover the Public Utilities Commission Reimbursement Surcharge as described in Rate Schedule RF and the Energy Commission Surcharge that is established by the California Energy Commission.

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			Resolution No.	_____

**SCHEDULE NO. TOU D-1 EV**

**ELECTRIC VEHICLE TIME-OF-USE DOMESTIC SERVICE**

**APPLICABILITY**

This electric vehicle time-of-use rate schedule is optional for Customers for whom Schedule D-1 is applicable. Service under this schedule is subject to meter availability. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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**TERRITORY**

Entire California Service Area.

**RATES**

**Customer Charge – TOU**

Per meter, per month \$15.27

**Energy Charges (Per kWh) – TOU**

	Distribution	Generation 1	Vegetation 2	SIP 4	PPP 5	BRRBA 7	Total	
Winter								
On-Peak	\$0.09335	\$0.07433	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.20891 (R)	(R)
Mid-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599 (R)	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458 (R)	(R)
Summer								
On-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599 (R)	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458 (R)	(R)

**Customer Charge – TOU CARE**

Per meter, per month \$12.21

**Energy Charges (Per kWh) – TOU CARE**

Winter								
On-Peak	\$0.09335	\$0.07433	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.20891 (R)	(R)
Mid-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599 (R)	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458 (R)	(R)
Summer								
On-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599 (R)	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458 (R)	(R)

**Other Energy Charges (Per kWh)**

Surcharges<sup>8</sup> \$0.00160

1. Generation – Charge includes the Energy Cost Adjustment Clause Billing Factor as described in the Preliminary Statement, Number 6.  
 2. Vegetation – Charge to recover amounts in the Vegetation Management Balancing Account, as described in the Preliminary Statement, Number 18.  
 3. CEMA – Charge to recover amounts in the Catastrophic Event Memorandum Account as approved in D16-12-024 and as described in the Preliminary Statement, Number 13.A.  
 4. SIP – Charge to recover the costs of the Solar Initiative Program as described in the Preliminary Statement, Number 21.  
 5. PPP – Charge to recover Public Purpose Programs funding energy efficiency and low income assistance programs described in Preliminary Statement, Numbers 10, 17 and 19.  
 6. GRCMA – Charge to recover amounts in the General Rate Case Memorandum Account as described in the Preliminary Statement, Number 13.I.  
 7. BRRBA – Charge to recover amounts in the Base Revenue Requirement Balancing Account as described in the Preliminary Statement Number 8.  
 8. Surcharges – Charge to recover the Public Utilities Commission Reimbursement Surcharge as described in Rate Schedule RF and the Energy Commission Surcharge that is established by the California Energy Commission.

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			Resolution No.	<u></u>

**SCHEDULE NO. TOU A-1 EV**

**ELECTRIC VEHICLE TIME-OF-USE SMALL GENERAL SERVICE**

**APPLICABILITY**

This Electric Vehicle time-of-use rate schedule is optional for Customers for whom Schedule A-1 is applicable. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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**TERRITORY**

Entire California Service Area.

**RATES**

**Customer Charge**

Per meter, per month \$22.98

**Energy Charges (Per kWh)**

A. Rates that are applicable to Customers where demand has not exceeded twenty (20) kilowatts for any three (3) months during the preceding twelve (12) months. Applicability criteria are set forth in Special Condition 5.

	Distribution	Generation <sup>1</sup>	Vegetation <sup>2</sup>	SIP <sup>4</sup>	PPP <sup>5</sup>	BRRBA <sup>7</sup>	Total	
Winter								
On-Peak	\$0.09335	\$0.07433	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.20891	(R)
Mid-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458	(R)
Summer								
On-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458	(R)

B. Rates that are applicable to all other Customers not meeting applicability criteria set forth in Special Condition 5.

Winter								
On-Peak	\$0.09335	\$0.07433	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.20891	(R)
Mid-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458	(R)
Summer								
On-Peak	\$0.09335	\$0.06141	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.19599	(R)
Off-Peak	\$0.09335	\$0.00000	\$0.00633	\$0.00072	\$0.00364	\$0.03054 (R)	0.13458	(R)

**Other Energy Charges (Per kWh)**

Surcharges<sup>8</sup> \$.00160

1. Generation – Charge includes the Energy Cost Adjustment Clause Billing Factor as described in the Preliminary Statement, Number 6.
2. Vegetation – Charge to recover amounts in the Vegetation Management Balancing Account, as described in the Preliminary Statement, Number 18.
3. CEMA – Charge to recover amounts in the Catastrophic Event Memorandum Account as approved in D16-12-024 and as described in the Preliminary Statement, Number 13.A.
4. SIP – Charge to recover the costs of the Solar Initiative Program as described in the Preliminary Statement, Number 21.
5. PPP – Charge to recover Public Purpose Programs funding energy efficiency and low income assistance programs described in Preliminary Statement, Numbers 10, 17 and 19.
6. GRCMA – Charge to recover amounts in the General Rate Case Memorandum Account as described in the Preliminary Statement, Number 13.1
7. BRRBA – Charge to recover amounts in the Base Revenue Requirement Balancing Account as described in the Preliminary Statement Number 8.
8. Surcharges – Charge to recover the Public Utilities Commission Reimbursement Surcharge as described in Rate Schedule RF and the Energy Commission Surcharge that is established by the California Energy Commission

(Continued)

Issued by

Advice Letter No. 206-E

Edward N. Jackson

Date Filed: December 5, 2022

Name

Decision No. D.22-08-024

President

Effective Date: January 4, 2023

Title

Resolution No. \_\_\_\_\_

**RULE 9**

**RENDERING AND PAYMENT OF BILLS**

B. Reading of separate Meters Not Combined. For purposes of billing, each meter upon the Customer’s premises will be considered separately, and the readings of two or more meters will not be combined except as follows:

1. Where combinations of meter readings are specifically provided for in the rate schedule.
2. Where the Utility’s operating convenience requires the use of more than one meter.
3. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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C. Payment of Bills. All bills for service are due and payable upon presentation and payment may be made at any commercial office of the Utility or to any representative of the Utility authorized to make collections. Payment of closing bills shall be made at the time of presentation.

If a Customer makes only a partial payment on a bill, the partial payment received will be credited to amounts in arrears according to age. Customer failure to pay as set forth herein will be subject to termination of service as set forth in Rule 11.

D. Returned Check Charge. Should a check from a Customer used to pay a bill for service be returned to Utility as uncollectible for any reason, including a lack of funds, a charge of \$5.00 will be added to the Customer’s account.

E. Equal Payment Plan. An equal payment plan is available to Small Customers who have received service at the same address for a minimum of twelve (12) consecutive months and have a satisfactory payment history.

1. The equal payment plan provides for twelve (12) equal payments of a Customer’s estimated annual bill based on their prior usage. Equal payments will begin the first full month of billing following the customer request to be placed on the program. After twelve (12) consecutive months on the Equal Payment Plan, there will be an adjustment from the Customer’s equal payment billing to actual billing. At that time, a new equal payment amount will be computed and any debit or credit balance will be spread over the new equal payment plan year.
2. The equal payment plan allows for pre-payment at the Customer’s request.

(Continued)

Advice Letter No.	<u>206-E</u>	Issued by <u>Edward N. Jackson</u> Name	Date Filed:	<u>December 5, 2022</u>
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			Resolution No.	_____

**RULE 10**

**DISPUTED BILLS**

- A. Domestic Service To A Residential Dwelling. Any customer who has initiated a billing complaint to the company or requested an investigation by the company within five days of receiving a contested bill for domestic service shall be given an opportunity for review of such complaint or investigation by a review manager of the company. The review shall include consideration of whether the customer should be permitted to amortize the unpaid balance of his account over a reasonable period of time not to exceed a 12-month period.
- B. For disputes related to Meter Data Management Agent (MDMA) transmitted data pursuant to D.22-08-024, Plug-in Electric Vehicle Submetering Protocol (PEVSP), any late, incomplete, or inaccurate submeter usage information will be disregarded. In these cases, the customer will be billed at the primary meter's current rate. The MDMA and the customer will attempt to resolve the issue and Liberty will perform validation checks according to the PEVSP established in D.22-08-024.
- C. Domestic and Nondomestic Service. Any customer, whose complaint or request for investigation regarding a bill for electric service has resulted in a determination by the Company which is adverse to him, may appeal such determination to the California Public Utilities Commission.
- D. Commission Appeal. When a customer and the company fail to agree on a bill for electric service:
  - 1. In lieu of paying the disputed bill the customer may deposit with the California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102, the amount claimed by the company to be due. A nonresidential customer who is unable to deposit the full amount in dispute for a bill covering a period in excess of 90 days shall deposit an amount equal to 90 days at the average disputed charge per day of the disputed bill.
  - 2. Checks or other forms of remittance for such deposit should be made payable to the California Public Utilities Commission.
  - 3. Upon receipt of the deposit the Commission will notify the company, will review the basis of the billed amount, and will advise both parties of its findings and disburse the deposit in accordance therewith.
  - 4. Service will not be terminated for nonpayment of the disputed bill when a deposit has been made with the Commission pending the outcome of the Commission's review.
  - 5. Failure of the customer to make such deposit within 17 days after presentation of the disputed bill and prior to the expiration date of a 15-day termination of service notice will warrant termination of his service. For domestic service the company shall make reasonable attempts to contact an adult at the customer's premises either by telephone or visit at least 24 hours prior to termination of service, except that, whenever telephone or personal contact cannot be accomplished, the Utility shall give, either by mail or in person, a Notice of Termination of Service at least 48 hours prior

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**RULE 12**

**OPTIONAL RATES AND INFORMATION TO BE PROVIDED TO THE PUBLIC**

- A. General Information. The Utility will maintain, open for inspection at its more important commercial offices, pertinent information regarding the service rendered to the Customer, including the following:
  - 1. A description of service that may be furnished as set forth in Rule No. 2.
  - 2. A copy of the tariff schedules consisting of rates, general Rules of the Utility, and forms of contracts and applications applicable to the territory served from that office.
- B. Effective Rates. The rates charged by the Utility for electric service are those on file with the Public Utilities Commission and legally in effect. A copy of complete tariff schedules and advice letters, as filed with the Commission, shall be maintained for public inspection at the General Office. Complete tariff schedules of all rates in effect in any one District of the Utility will be kept in that District Office where they may be consulted by the public during office hours.
- C. Optional Rates. Where there are two or more rate schedules, rates, or optional provisions applicable to the class of service requested by the Applicant, the Utility of its authorized employees will call Applicant's attention, at the time application is made to the several schedules, and the Applicant must designate which rate schedule, rate, or optional provision he desires. When the Customer notifies the Utility of any material change in the size, character, or extent of his utilizing equipment or operations, in accordance with Section C of Rule No. 3, the Utility will, within a reasonable time, advise the Customer of the resulting rate options. In the absence of the notification provided for in Section C of Rule No. 3, the Utility assumes no responsibility for advising the Customer of lower optional rates under other existing schedules, rates, or optional provisions available as a result of the Customer's changes in equipment or operations.
- D. New or Revised Rates. Should new or revised rates be established after the time application is made, the Utility will, within a reasonable time, use such means as may be practicable to bring them to the attention of those of its Customers who may be affected thereby.
- E. Change of Rate Schedule.
  - 1. A change to another applicable rate schedule, rate, or optional provision will be made only where the Customer elects to make such change.
  - 2. Should a Customer so elect, the change will be made provided:
    - a. A change has not been made effective during the past twelve month period; or
    - b. The change is made to, or from, a new or revised rate schedule; or
    - c. There has been a change in the Customer's operating conditions for that service which, in the opinion of the Utility, justifies the change; and
    - d. The change is not made more often than once in twelve months where service is being supplied under a schedule containing an annual fixed charge or an annual minimum charge; and
    - e. The Customer has made the request by written notice to the Utility.

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**RULE 12**

**OPTIONAL RATES AND INFORMATION TO BE PROVIDED TO THE PUBLIC**

E. Change of Rate Schedule. (Continued)

- 3. The change will become effective for the billing period during which the Customer has requested the change.
- 4. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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F. Interconnection. Unless otherwise stated in the rate schedule, the rate schedules of the Utility are applicable only for service supplied entirely by the Utility without interconnection with any other source of supply, except that interconnection may be made by double-throw switch where necessary to meet the minimum requirements for emergencies

G. Stand-By Service. The Utility will not supply stand-by or breakdown service to customers whose premises are regularly served with light, heat or power from a source of supply other than the Utility. Stand-by service will not be supplied to any system, business or service regularly used in competition with the service of this Utility or where such stand-by service is desired or intended for resale or redistribution or as otherwise stated in Rule No. 19.

Advice Letter No. 206-E      Issued by Edward N. Jackson  
Name  
 Decision No. D.22-08-024      President  
Title

Date Filed: December 5, 2022

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Resolution No. \_\_\_\_\_

**RULE 16**

**SERVICE EXTENSIONS**

**C. METERING FACILITIES.** (Continued)

**2. NUMBER OF METERS.** (Continued)

A single meter is required for each single enterprise operating in one building or group of buildings or other development on a single Premises such as, but not limited to, a commercial business, school campus, industrial manufacturer or recreational vehicle park, unless otherwise approved by Utility. See Rule 2 for more information.

Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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**3. MULTIPLE OCCUPANCY.** In a building with two or more tenants, or where Utility furnishes more than one meter on the same Premises, Utility’s meters normally shall be grouped at one central location, or as otherwise specified by Utility, and each meter position or socket shall be clearly and permanently marked by Applicant, customer, or owner of the Premises to indicate the particular unit, occupancy, or load supplied by it.

**a. RESIDENTIAL.** Utility will individually meter electric service to every residential unit in a residential building or group of buildings or other development with multiple tenants such as, but not limited to, apartment buildings, mobile home parks, etc., except as may be specified in Rule 2 and applicable rate schedules.

**b. NON-RESIDENTIAL.** Utility will individually meter electric service to each tenant in a non-residential building or group of buildings or other development on a single Premises with multiple tenants or enterprises (such as, but not limited to, an office building or shopping center complex). Alternative metering arrangements as determined by Utility may be allowed only as specified in Rule 2 and applicable rate schedules.

**D. SERVICE LATERAL FACILITIES**

**1. GENERAL LOCATION.** The location of the Service Lateral facilities shall extend:

**a. FRANCHISE AREA.** From the point of connection at the Distribution Line to Applicant’s nearest property line abutting upon any street, highway, road, or right-of-way, along which it already has, or will install distribution facilities, and

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RULE 17

**MEASUREMENT OF SERVICE**

A. Measurement of Electric Energy

- 1. All electric energy as supplied by the Liberty Utilities (CalPeco Electric) LLC its Customers shall be measured by means of suitable standard electric meters, except energy delivered under street lighting tariffs on a rate-per-lamp basis, and energy, estimated from load and operating time data, for highway sign lighting, traffic control and other installations where metering is impractical.
- 2. For billing purposes, all meters upon the Customer’s premises will be considered separately, and the readings thereof will not be combined, except that where the Utility shall, for operating convenience, install upon the Customer’s premises, in place of one meter, two or more meters, then the readings of such two or more meters may be combined for billing purposes.
- 3. Where electricity is furnished for EV charging, a customer may use the Electric Vehicle Supply Equipment (EVSE) as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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B. Standard of Accuracy

The average error of a meter is one-half the algebraic sum of the error at light load (1% to 10% of rated capacity) and the error at heavy load (60% to 100% of rated capacity). No meter will be installed which has an error of more than 2% fast or slow at light or at heavy load. Whenever on any test, a meter is found to exceed these limits it will be adjusted or replaced.

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Name

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**RULE 24**

**ELECTRIC VEHICLE INFRASTRUCTURE**

**APPLICABILITY:** This rule is applicable to all separately metered Electric Vehicle (EV) charging infrastructure installations with the exception of single-family homes, and Incidental Load. This rule supports all Electric Distribution Infrastructure on the utility side of the Customer’s meter (EV Service Extension) for Commercial and Multi-family Unit Dwelling Customers (Applicant) installing separately-metered infrastructure to support EV Supply Equipment (EVSE). To be eligible for this rule, Applicant must purchase and install qualified EV Supply Equipment in the quality approved by utility in utility’s sole discretion.

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EV infrastructure installations will be considered qualified if they meet the safety requirements of the Transportation Electrification Safety Checklist related to utility-side infrastructure adopted via California Public Utilities Commission Decision (D.)18-09-034. Proof of commitment to install the EVSE is required from all applicants. A proof of commitment is any documentation of clear intent to procure and deploy EVSE, including but not limited to a purchase order, budget approval, grant agreement, request for proposal results, governance-body mandated procurement and deployment, approved site plan where the EVSE will be installed, local government permit, etc.

Applicant must agree to maintain and operate the EV Charging Stations associated with this rule for a period of five years. After utility has completed all utility-side work, Applicant must install and energize all customer-side equipment including the EV Charging Stations within a timeframe agreed upon between the utility and the Applicant. The Applicant is required to notify the utility when the EV Charging Stations are energized.

Utility will validate the installation of the EV Charging Stations after energization. The frequency and type of review may vary. Utility may conduct an in-person examination or validate the installation using meter data. Utility may periodically validate that the EV Charging Stations remains in use via validating meter data or in-person examination.

Customers taking service under this Rule must agree to remedy any maintenance or reliability issues promptly to ensure that the EV Charging Stations are functional and available for charging. Applicant must agree to maintain the EV Charging Stations for at least five years and to set aside funding to support maintenance and operations.

Failure to comply with these terms may, at utility discretion, result in termination of the contract and discontinuation of service or de-energization of the EV infrastructure. The utility may also pursue reimbursement of the costs incurred in connection with deploying the utility-side EV infrastructure and any costs associated with the removal of the utility-side EV infrastructure.

As a default, participants will be enrolled on Liberty's commercial time-variant electric vehicle rate. Customers may elect to change to another applicable time-variant rate after initial enrollment.

This rule is not applicable to distribution line extensions, which shall be installed in accordance with Rule 15, Electric Line Extensions. Rule 24 may be revised after the completion of Liberty's General Rate Case cycle, and subsequent to year 2024.

**A. GENERAL**

- 1. DESIGN.** Utility will be responsible for planning, designing, and engineering its EV Service Extension Facilities using Utility's standards for design, materials and construction.
- 2. SERVICE DELIVERY POINT.** For the purposes of this rule the Service Delivery Point is defined as the utility-owned meter.

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**RULE 24**

**ELECTRIC VEHICLE INFRASTRUCTURE**

- 10. ACCESS TO APPLICANT'S PREMISES.** Utility shall at all times have the right to enter and leave Applicant's Premises for any purpose connected with the furnishing of electric service (meter reading, inspection, testing, routine repairs, replacement, maintenance, emergency work, etc.) and the exercise of any and all rights secured to it by law, or under Utility's tariff schedules. These rights include, but are not limited to:
  - a.** The use of a utility-approved locking device, if Applicant desires to prevent unauthorized access to Utility's facilities;
  - b.** Safe and ready access for Utility personnel free from unrestrained animals;
  - c.** Unobstructed ready access for Utility's vehicles and equipment to install, remove, repair, or maintain its facilities; and
  - d.** Removal of any and all of its property installed on Applicant's Premises after the termination of service.
- 11. SERVICE CONNECTIONS.** Only personnel duly authorized by Utility are allowed to connect or disconnect service conductors to or from Utility's Distribution Lines, remove meters, remove Utility-owned service facilities, or perform any work upon Utility-owned existing facilities.
- 12. INCIDENTAL LOAD.** The incidental load is limited to devices directly needed solely to support the EV infrastructure and charging uses of the site itself. The added load included on the EV meter must not include load from any non-EV charging infrastructure facilities, appliances or apparatus.

**B. INSTALLATION OF EV SERVICE EXTENSION**

**1. METERING**

- a. METER ALL USAGE.** Utility will meter delivery of all electric power and energy, unless otherwise provided for by Utility's tariff schedules or by other applicable laws.
- b. METER LOCATION.** All utility meters and associated metering equipment shall be located at some protected location on Applicant's Premises as approved by Utility. The load served at each meter location shall consist of only EV load and incidental loads and will be clearly designated by the customer.
- c. NUMBER OF METERS.** The utility shall install a single meter per premise under this rule.
- d. EVSE SUBMETERING.** Where electricity is furnished for EV charging, a customer may use the EVSE as a submeter to measure EV charge load, and ancillary EV charge service (i.e., demand response, vehicle-grid integration, etc.). All EVSE used for submetering purposes must meet the requirements established in the Plug-in Electric Vehicle Submetering Protocol pursuant to Decision 22-08-024.

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**2. GENERAL LOCATION.** The location of the EV Service Extension shall extend:

- a. FRANCHISE AREA.** From the point of connection at the Distribution Line to Applicant's nearest property line abutting upon any street, highway, road, or right-of-way, along which it already has, or will install distribution facilities; and

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# **Plug-in-Electric Vehicle Submetering Protocol Implementation Plan**

December 5, 2022

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## Plug-in-Electric Vehicle Submetering Protocol Implementation Plan

### 1. Overview

Decision (D.)22-08-024 adopted Plug-in Electric Vehicle Submetering Protocol (PEVSP) and Electric Vehicle Supply Equipment (EVSE) Communication Protocols. Ordering Paragraph (OP) 3, requires each Investor Owned Utility (IOU) to file a Tier 2 advice letter including an implementation plan containing a timeline to modify the utility's billing system to incorporate the Plug-in Electric Vehicle Submetering Protocol, the timelines and process for resolving billing disputes, the estimated costs associated with implementing the requirements of this decision, and a standardized data format and transfer protocol to share data between an electric vehicle service provider/meter data management agent and a utility. Liberty established the Submetering Protocol Implementation Memorandum Account (SPIMA) to track and record the incremental costs associated with implementing the submetering protocol, to be reviewed for reasonableness and cost recovery in Liberty's next general rate case. SPIMA was approved in Liberty's Advice Letter 195-E.

### 2. Estimated Costs

Liberty has about 49,000 electric customers in California. The three large Investor-Owned Utilities (IOUs) combined have about 12 million electric accounts.<sup>1</sup> Meter Data Management Agents (MDMAs) responding to an IOU survey estimated a total of 1,115 expected applications for participation in 2023 and 2,175 for 2024. Based on Liberty's percentage (0.4%) of the California IOUs' electric customer base, it is reasonable to estimate in Liberty's service territory, 5 customers may be willing to participate in 2023 and 9 customers in 2024.

The IOUs received only 5 responses from outreach out of 42 MDMAs from a list of approved network providers. Two of the respondents did not plan on participating in the submetering program. The median number of expected participants is 100 for 2023 and 150 for 2024. Extrapolating the results of survey respondents to the entire list of approved network providers shows a potential of 2,500 participants in 2023 and 3,750 in 2024. This methodology of calculating customers willing to participate suggests about 10 participants in 2023 for Liberty and 15 in 2024.

Using an average of estimated participants statewide to calculate Liberty customer participation as a percentage of total IOU customers comes out to two and three (rounding up) for 2023 and 2024 respectively. *Table 1* shows the estimated number of participants per survey responding MDMA.

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<sup>1</sup> Retrieved from company websites: November 11, 2022.  
[https://www.pge.com/en\\_US/about-pge/company-information/profile/profile.page](https://www.pge.com/en_US/about-pge/company-information/profile/profile.page)  
<https://www.edisoncareers.com/page/show/about-sce/#:~:text=We%20proudly%20serve%20approximately%2015,Central%2C%20Coastal%20and%20Southern%20California.>  
<https://www.sdge.com/more-information/our-company#:~:text=SDG%26E%20is%20a%20regulated%20public,area%20spans%204%2C100%20square%20miles.>

**Table 1**  
**Estimated Statewide Participation per Survey Respondents**

Submetering Program Year	Estimated Participants MDMA #1	Estimated Participants MDMA #2	Estimated Participants MDMA #3	Total Estimated Participants	Median Estimated Participants	Average Estimated Participants
2023	15	100	1,000	1,115	100	372
2024	25	150	2,000	2,175	150	725

Liberty is basing its cost estimate on incremental labor expense to set up a manual billing account, retrieve and process data, and to send the bill to the customer. Since the total costs will depend on number of customers enrolled, Liberty is forecasting costs assuming 10 customers in 2023 and 15 customers in 2024 per the median extrapolation methodology discussed above. Liberty estimates a minimum of one full-time employee equivalent to work on submetering, or approximately \$156,000 (including overheads).

The IOUs received a late response to the survey from an interested MDMA estimating participation in the tens to hundreds for year 2023 and in the hundreds to thousands for 2024. Since this response provides a wide range of potential participants, the data is assumed to be included in the 60 percent of MDMA's willing to participate already captured in the median analysis above. Including the late respondent's participation estimate in the total of all responding MDMA's is shown with Liberty's proportion of participants in *Table 2*.

**Table 2**  
**Liberty's Proportion of Total per Survey Respondents**

Submetering Program Year	Estimated Participants MDMA #1	Estimated Participants MDMA #2	Estimated Participants MDMA #3	Estimated Participants MDMA #4	Total Estimated Participants	Liberty's Estimated Proportion
2023	15	100	1,000	100	1,215	5
2024	25	150	2,000	1,000	3,175	13

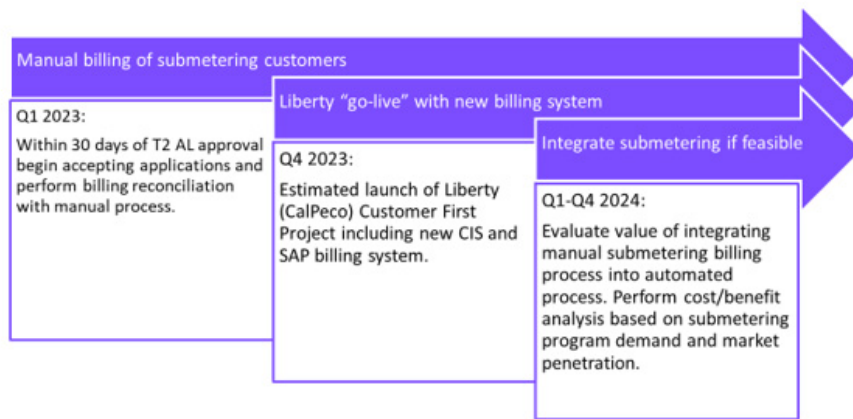
The costs to automate the billing process for Liberty's submetering customers are uncertain. It is unlikely the costs to automate the manual billing process for 10 to 15 customers will be outweighed by the benefits of eliminating the manual process. However, if the number of participants increases to the point where it would cost less to automate, Liberty would consider that option.

**3. Timeline to Modify Liberty's Billing System to Incorporate PEVSP**

Liberty is currently in the process of an enterprise-wide upgrade to its information system including the billing system. Liberty has also not yet implemented Advanced Metering Infrastructure (AMI) which is a critical component of integrating automated billing of PEV sub metered customers. The expected launch of Liberty's Customer First project which includes a new Customer Information System (CIS) is planned for fourth quarter of 2023. Implementation of AMI is expected to be late 2023 or early 2024. In 2024,

Liberty will evaluate the value and feasibility of integrating the manual billing process for submetering into the CIS with an automated process. The 24-month timeline is shown in Figure 1.

**Figure 1**  
**Billing System Modification Timeline**



#### 4. EVSP Approved Provider Requirements

Electric Vehicle Service Equipment (EVSE) and Electric Vehicle Service Providers (EVSPs) must meet certain standards and requirements to participate in the submetering program. The MDMA, if different from the EVSP also must meet the requirements of the PEVSP. The requirements to qualify include but are not limited to the following:

- All ratepayer-funded AC-conductive EVSE utilize SAE J1772 connectors and DC-conductive EVSE utilize CCS connectors for light-duty use cases.
- Meet standards and requirements as described in D.22-08-024, p.29.
- Complete and submit an enrollment form.
- Provide timely and accurate data in accordance with the PEV Submetering Protocol, adopted by the Commission as Attachment A of D.22-08-024.
- EVSE Testing & Certification approval from a National Recognized Testing Lab (NRTL) and must pass all certificate testing that align with the California Department of Measurements and Standards' California Type Evaluation Program.
- Meet and adhere to all compliance requirements in Chapter D. of the Submetering Protocol including but not limited to the roles, functions, support, confidentiality, and security descriptions.



## 5. Customer Participation Process

Customers must have a certified MDMA or EVSP completed agreement to participate in the program. The customer authorizes the third party to share their data. Liberty requires completion of an enrollment application which identifies the MDMA to transfer data on their behalf. A customer without a certified MDMA to transfer submetered data will not be accepted into the program. The MDMA is essentially applying to participate in the program on behalf of the customers it represents.

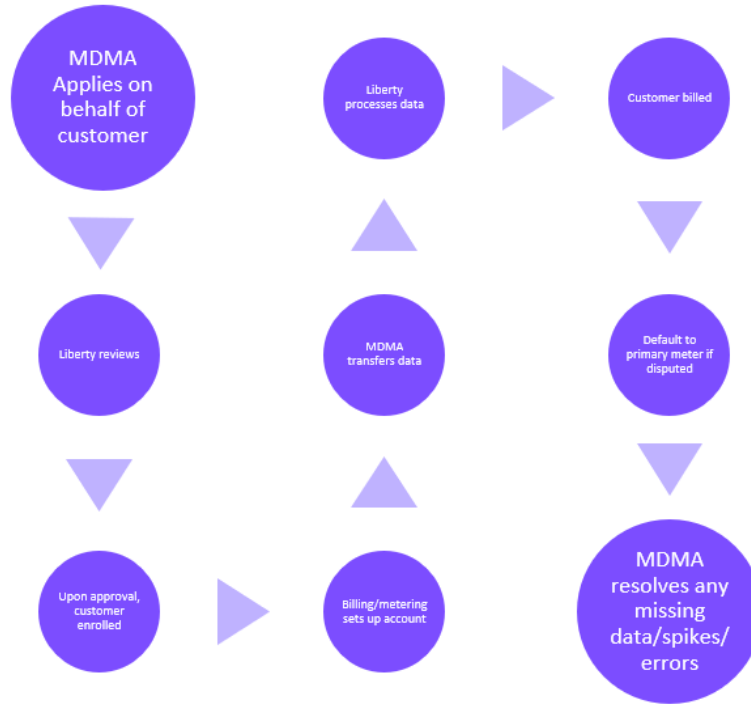
Upon review and acceptance of the application, Liberty will establish a manual billing account for the EV submetering customer. The MDMA will transfer data as described in the standardized data format and transfer protocol. Liberty will review, validate, and process the data as described in the manual billing process and in accordance with the PEVSP. Any billing disputes with MDMA data will be resolved as described in the billing dispute process.

Customers may be disenrolled due to moving within Liberty's service territory. It is up to the customer if they would like to reenroll through the customer participation process described above. Customers disenrolled due to MDMA non-compliance may be allowed to reenroll with another qualified MDMA through the same process. Non-compliance is defined in section VI of the PEVSP as, ". . . when more than 1% of the service accounts served by a 3rd-party MDMA, or 20 accounts, whichever is greater, are found to be non-conforming and are not remediated during the first 6 months of submetering participation; and when more than 0.5%, or 10 accounts, whichever is greater, are found to be non-conforming and are not remediated during any 6 consecutive months thereafter."<sup>2</sup> Figure 2, shows the participation process flow.

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<sup>2</sup> PEVSP at p. 17.

**Figure 2**  
**Participation Process Flow**



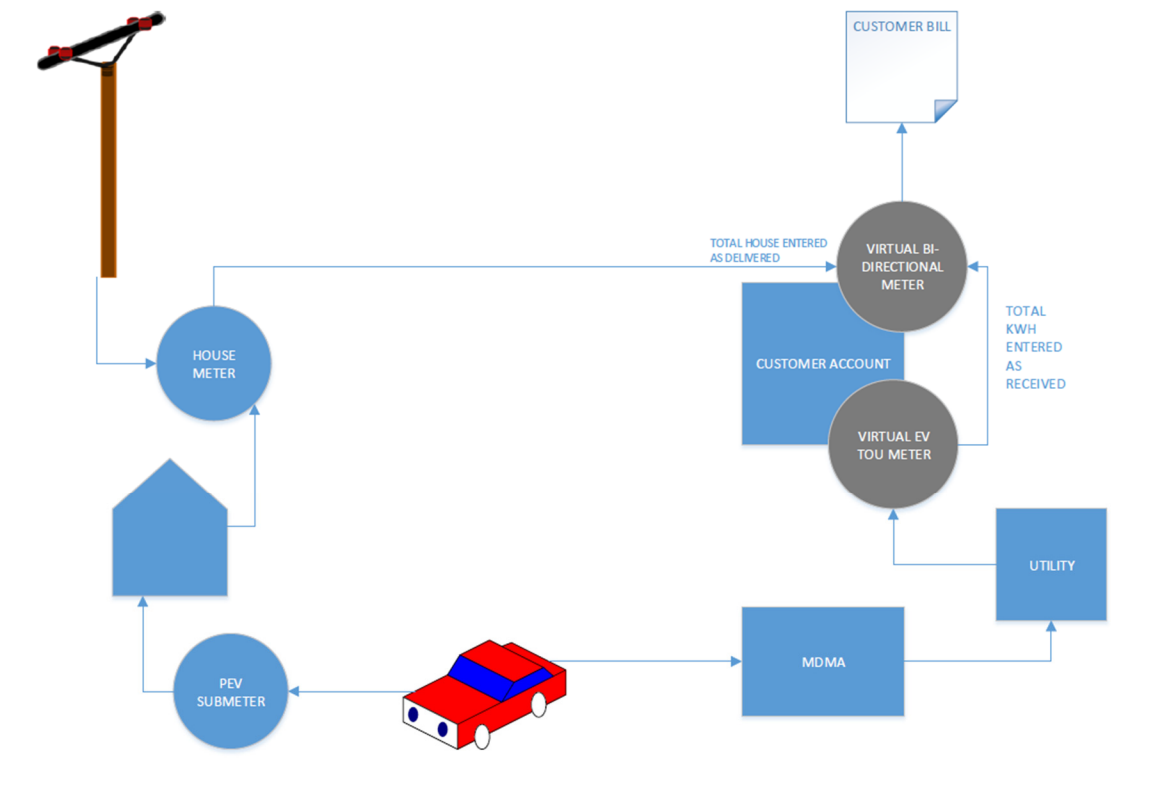
## 6. Manual Billing Process

Liberty’s manual billing process for PEV submetered customers consists of nine steps. The steps are listed below and depicted in *Figure 3, below*.

- 1) Submeter account setup.
  - a. Liberty’s Metering department changes the rate of the existing meter to reflect the customer is being billed as an EV submetered customer.
  - b. Another connection is created on the account for the premise location.
  - c. Metering adds the existing active meter rate to the Billing Meter which is setup like a NET/Solar meter with a delivered kWh read and a received kWh read.
  - d. The delivered kWh read is anchored to match the original existing meter’s read.
- 2) Metering adds another connection to the existing location which is assigned a meter number and setup as an EV TOU Meter.
  - a. Submeter is in addition to the customers main meter (Primary) and Billing Meter.
  - b. A message is added to the location as an account flag identifying the location as a PEV Submetering account.
- 3) The regular cycle read imports as usual with the cycle reads to the original connection (AKA Recording Meter/Dummy Meter).
- 4) Upon completion of setup by Metering, Billing is notified.
  - a. Billing adds the location to a tracking spreadsheet stored in Liberty’s network database.
  - b. Spreadsheet workbook tracks each billing cycle separately.
- 5) Billing department will add cycle locations with PEV Submetering accounts to a Cycle Hold list.

- a. MDMA data is analyzed and reads entered.
  - b. Cycle reads for PEV Submetering will need to align with primary meter cycle reads.
- 6) Driven by cycle, Billing captures the read from the Recording Meter/Dummy Meter and enters as delivered read on the Billing Meter.
- 7) Billing captures data from the MDMA read report.
  - a. Data is formatted with fields for Times of Day and Season summed as kWh reads.
  - b. Usage data is entered pertaining to each time of day and season.
  - c. Total kWh data is captured for all that month's usage.
  - d. Data is entered into EV TOU connection setup.
- 8) Total kWh from the EV TOU Meter is entered as the received read on the Billing Meter.
- 9) Customer is billed at the EV TOU rate for EV charging and billed on their otherwise applicable tariff net usage after the received read has been deducted from the total delivered.

**Figure 3**  
**Billing PEV Submetering**



## 7. Timelines and Process for Resolving Billing Disputes

Late, incomplete, or inaccurate submeter usage information will be disregarded. As a result, any EV charging during those intervals will be billed at the primary meter's current rate.<sup>3</sup> Any billing disputes not associated with MDMA submetered data will be resolved in accordance with Liberty's Rule 10, Billing Disputes. For disputes related to MDMA transmitted data, the resolution process (*Figure 4*) is as follows:

- 1) The MDMA and the customer will attempt to resolve the issue.
- 2) The MDMA verifies and validates the submeter data accuracy, and the submission of data followed transfer protocols.
- 3) The MDMA resends the data to Liberty before their cycle billing close date as determined in the Manual Billing Process.
- 4) Liberty performs validation checks:
  - a. Associated customer metadata (i.e., account number, meter number) is correct.
  - b. Number of intervals present matches number of intervals expected.
  - c. Time stamps of data file are accurate and match billing window.
  - d. The unit of measure is correct.
  - e. The submeter usage data does not exceed the primary meter usage data for any interval.
- 5) If the file fails any of the above checks, the file will be rejected and not used for billing purposes. The MDMA will be notified of the rejection and will have the timeline, established with Liberty, to send corrected actual usage data. Otherwise, the primary meter data will be used for billing.<sup>4</sup>

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<sup>3</sup> PEVSP at p. 11.

<sup>4</sup> PEVSP at p. 16.

**Figure 4**  
**Billing Dispute Resolution Process**



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## 8. Standardized Data Format and Transfer Protocol

MDMAs participating in the EV Submetering program will need to complete agreement forms with the customers and Liberty. The forms will authorize the sharing of customer data following established protocols related to third party access to customer information. This includes cyber security and protection of personal information. Upon approval of enrollment forms, Liberty will set up the account for the submetered customer as described in the manual billing process section above.

Data will be transferred on a rolling monthly basis from the qualified MDMA to Liberty in a flat file format via a Secure File Transfer Protocol (SFTP) site with access provided by Liberty. Liberty will provide the delivery date for the transfer based on the customer's premise billing cycle. The MDMA will notify Liberty in a timely manner of any data validation or access issues involving submeter data. All disputes from customers related to submetered billing will be resolved between the customer and the MDMA as described in the billing dispute process. Liberty will assess the feasibility of automating data transfer and billing processes based on program demand.



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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: Cindy Fisher

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E-mail: Cindy.Fisher@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) #: 206-E

Tier Designation: 2

Subject of AL: PEV Submetering Protocol Implementation Plan and Tariff Updates

Keywords (choose from CPUC listing): Transportation Electrification, Tariffs

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.22-08-024

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: 1/4/23

No. of tariff sheets: 13

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: Schedule No. D-1, Schedule No. CARE, Schedule No. DS-1, Schedule No. DM-1, Schedule No. A-1, Schedule No. TOU D-1 EV, Schedule No. TOU A-1 EV, Rule 9, Rule 10, Rule 12, Rule 16, Rule 17, Rule 24

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  
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505 Van Ness Avenue  
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Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

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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	