



Liberty Utilities (CalPeco Electric) LLC
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South Lake Tahoe, CA 96150
Tel: 800-782-2506
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April 30, 2025

VIA EMAIL ONLY

EDTariffUnit@cpuc.ca.gov

**Advice Letter No. 267-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) – Quarterly Federal Grant Programs Participation Information

Purpose

Pursuant to Ordering Paragraph (“OP”) 5 of California Public Utilities Commission (“Commission”) Resolution E-5254, Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty”) submits this informational **Tier 1** Advice Letter (“AL”).

Background

OP 5 of Resolution E-5254, the CPUC ordered:

Starting in Q3 of 2023 until all projects funded with Infrastructure Investment and Jobs Act (“IIJA”) grants are completed and implemented or Energy Division has notified the IOU that further reporting is no longer needed, Bear Valley Electric Service, Inc. (BVES), Liberty Utilities (CalPeco Electric) LLC (Liberty), Pacific Gas and Electric Company (PG&E), PacifiCorp d.b.a. Pacific Power (PacifiCorp), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and Southwest Gas Company (SWGAs) shall submit quarterly Tier 1 Information-Only advice letters containing, at a minimum, the information requested in Table 2 of this Resolution. Alpine Natural Gas and West Coast Gas Company should begin reporting in the quarter following approval of their Tier 2 Advice Letter in Ordering Paragraph 1.

Information

1. Status of applications submitted to DOE (under review, not awarded, awarded, etc.) including timeframe, the grant section number, and project name.

Liberty’s “Project Leapfrog: Foundational AMI and Grid Edge Computing Technology Deployment” described in prior updates was formally awarded to the company on October 1, 2024. Liberty has submitted Project Management Plan, Community Benefit

Plan, and Cybersecurity Plan as of 12/31/24.

2. Descriptions of projects proposed in grant applications, or anticipated use of funding, requested grant level (and commensurate ratepayer matching funds).

The project entails an upgrade to the company's end-of-life electrical metering system that currently relies on obsolete electromechanical metering technology with a modern Advanced Metering Infrastructure ("AMI") platform that would enable over-the-air meter reading and the establishment of a number of critical grid edge computing capabilities that would help the company streamline its operations, better detect potential wildfires, and optimize the integration of newer edge technologies.

By way of providing additional context, Liberty notes that Project Leapfrog's scope is materially broader than the foundational AMI project that underwent the Commission's review during Liberty's last General Rate Case. All incremental scope components entail features and capabilities that the Company planned to implement in future phases of its AMI roadmap in the absence of DOE funding. They include:

- Integration of AMI with Liberty's Outage Management System
- Deployment of software to enable the AMI mesh network to also support Distribution Automation (DA) and/or Online Sensor assets and deploying these assets at several locations in the key areas of the service territory.
- Utilization of edge computing capabilities inherent in AMI meters through the use of Distributed Intelligence (DI) apps such as high temperature or high impedance alarms, or load disaggregation.
- Phasing out or significantly reducing reliance on the increasingly obsolete MV-90 technology that measures consumption from larger customers.

The DOE grant provided an opportunity to implement these additional capabilities within a more condensed timeframe, and within a cost envelope that Liberty expects to have a rate impact comparable to that of the foundational capability alone. The DOE's award amount to be contributed to the project is \$13.1M. The Commission has previously approved a settlement amount of \$19.75M for a much more narrowly scoped AMI project in 2022. The DOE's current estimated project total (\$33.3M) has remained the same from the previous quarterly filing. The Company expects to seek approval for the recovery of the currently unfunded portion of the project in a future proceeding.

3. Identify partners on the applications (other IOUs or POU's, State agencies, Tribes, etc.).

Liberty has consulted with multiple local stakeholders, including South Tahoe Public

Utility District, City of South Lake Tahoe, City of Loyalton, Barton Memorial Hospital, Tahoe Prosperity Center, Advance, Town of Truckee, El Dorado County, Placer County, Alpine County Supervisor, Alpine County Admin. Office, Sierra County, Washoe Tribe, Lake Tahoe USD, Tahoe Chamber, Tahoe Regional Planning Association, Lukins Water, and Vail Ski Corp. Partnership opportunities have been discussed with all parties and will commence in the event of the grant being awarded.

4. Assessment of future award opportunities including match requirements and the expected source(s) for any match funding.

Liberty is currently concentrating its efforts on getting the current project off to a successful start and is not currently planning on submitting any more federal government grant applications.

Effective Date

Liberty requests that this **Tier 1** advice letter be effective as of April 30, 2025.

Protests

Anyone wishing to protest this advice letter may do so by letter sent via U.S. mail, facsimile, or email, any of which must be received no later than May 20, 2025, which is 20 days after the date of this advice letter. There are no restrictions on who may submit a protest, but the protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. Protests should be mailed to:

California Public Utilities Commission
Energy Division, Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298
Facsimile: (415) 703-2200
Email: edtariffunit@cpuc.ca.gov

The protest should also be sent via email and U.S. mail to Liberty Utilities (CalPeco Electric) LLC at the address shown below on the same date it is mailed or delivered to the Commission:

Liberty Utilities (CalPeco Electric) LLC
Attn: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Email: CaseAdmin@libertyutilities.com

Energy Division Tariff Unit
California Public Utilities Commission
April 30, 2025
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Notice

In accordance with General Order 96-B, Section 4.3, a copy of this advice letter is being sent electronically to parties shown on the attached service list.

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

Respectfully submitted,

LIBERTY

/s/ Elly O'Doherty
Elly O'Doherty
Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List

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

VIA EMAIL

gbinge@ktminc.com;
epoole@adplaw.com;
cem@newsdata.com;
rmccann@umich.edu;
bhodgeusa@yahoo.com;
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dietrichlaw2@earthlink.net;
ejanssen@b2energylaw.com;
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bbiering@b2energylaw.com;
plumascoco@gmail.com;
marshall@psln.com;
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gross@portersimon.com;
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kjl@cpuc.ca.gov;
fadi.daye@cpuc.ca.gov;
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xian.li@cpuc.ca.gov;
Candace.Morey@cpuc.ca.gov;
mts@cpuc.ca.gov



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Liberty Utilities (CalPeco Electric) LLC (U-933-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Elly O'Doherty

Phone #: 530-807-8987

E-mail: Elly.Odoherty@libertyutilities.com

E-mail Disposition Notice to: AnnMarie.Sanchez@libertyutilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 267-E

Tier Designation: 1

Subject of AL: Infrastructure Investment and Jobs Act (IIJA) 2025Q1 Update

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-5254

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

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: 4/30/25

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: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Elly O'Doherty
Title: Manager, Rates and Regulatory Affairs
Utility Name: Liberty Utilities (CalPeco Electric) LLC
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 530-807-8987
Facsimile (xxx) xxx-xxxx:
Email: Elly.Odoherty@libertyutilities.com

Name: AnnMarie Sanchez
Title: Coordinator
Utility Name: Liberty Utilities (California)
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 562-805-2052
Facsimile (xxx) xxx-xxxx:
Email: AnnMarie.Sanchez@libertyutilities.com

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 | |