



Liberty Utilities (CalPeco Electric) LLC  
933 Eloise Avenue  
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, 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 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](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 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@ktmnc.com;  
epoole@adplaw.com;  
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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 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: 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](mailto:Elly.Odoherty@libertyutilities.com)

Name: AnnMarie Sanchez  
Title: Coordinator  
Utility Name: Liberty Utilities (California)  
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City: Downey State: California  
Telephone (xxx) xxx-xxxx: 562-805-2052  
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Email: [AnnMarie.Sanchez@libertyutilities.com](mailto:AnnMarie.Sanchez@libertyutilities.com)

Clear Form

## 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
Curtailable 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	