



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

May 27, 2020

VIA EMAIL

**Advice Letter No. 143-E
(U 933-E)**

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

SUBJECT: Second Report on Possible Wildfire Mitigation Plan Off Ramps

I. PURPOSE

Pursuant to Ordering Paragraph 1 of California Public Utilities Commission (“CPUC” or “Commission”) Decision (“D.”) 19-05-036, issued June 3, 2019, Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”) submits this Second Report on Possible Wildfire Mitigation Plan (“WMP”) Off Ramps describing possible concerns about the effectiveness of programs in the WMP as currently defined and applied.

II. BACKGROUND

On September 21, 2018, California Governor Edmund G. Brown, Jr. signed Senate Bill (“SB”) 901 into law to support adaptation and resilience to increasingly frequent and extreme wildfires and to better prepare the state for wildfire prevention and response. SB 901 established plans and protocols for WMPs and cost recovery standards for California electric utilities to be reviewed by the CPUC.

On October 25, 2018, the Commission issued R.18-10-007 to implement the provisions of SB 901 related to electric utility wildfire mitigation planning. Section 8386 of the California Public Utilities Code requires all California electric utilities subject to Commission oversight to prepare and submit WMPs that describe the utilities’ plans to prevent, combat, and respond to wildfires within their respective service territories. Section 8386 details the required contents for the fire mitigation plans and prescribes a three-month window, starting on the issuance date of R.18-10-007, for the Commission to approve the WMPs for all electric utilities under its jurisdiction.¹ In compliance with the legislation, Liberty CalPeco submitted its 2019 Wildfire Mitigation Plan in February 2019. On May 30, 2019, the Commission issued D.19-05-040, authorizing the plan.

¹ See California Public Utilities Code Section 8386.

Ordering Paragraph 1 of D.19-05-036 requires Liberty CalPeco to file two advice letters describing any concerns about the effectiveness of any program in its 2019 WMP. Liberty CalPeco submitted its first WMP Off Ramp Advice Letter, AL 133-E, on December 2, 2019, which was approved in D.20-03-004.

III. DISCUSSION

At this time, Liberty CalPeco does not have any specific concerns to report about the effectiveness of any program in its 2019 WMP beyond the concerns reported in AL-133-E and in Liberty CalPeco's 2020 WMP filing.

TIER DESIGNATION AND EFFECTIVE DATE

In accordance with Ordering Paragraph 1 of D.19-05-036, this advice letter is submitted with a Tier 3 designation. Liberty CalPeco requests an effective date of July 1, 2020.

PROTESTS

Protests of this Advice Letter may be sent by letter via U.S. mail, by facsimile, or by email, any of which must be received no later than June 16, 2020, 20 days after the filing date of this Advice Letter. There are no restrictions on whom may submit a protest, but the protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. Protests should be mailed to:

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

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

Liberty Utilities (CalPeco Electric) LLC
Attn: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Fax: (530) 544-4811
Email: Dan.Marsh@libertyutilities.com

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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. This advice letter will also be served on the service list for R.18-10-007.

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

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/ Daniel W. Marsh

Daniel W. Marsh

Manager, Rates and Regulatory Affairs

cc: Liberty CalPeco General Order 96-B Service List
R.18-10-007 Service List

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

VIA EMAIL

gbinge@ktminc.com;
emello@sppc.com;
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travis.ritchie@sierraclub.org;
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sharon.yang@libertyutilities.com;
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ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Dan Marsh

Phone #: 562-805-2083

E-mail: Dan.Marsh@libertyutilities.com

E-mail Disposition Notice to: Dan.Marsh@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) #: 143-E

Tier Designation: 3

Subject of AL: Second Report on Possible Wildfire Mitigation Plan Off Ramps

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 #: D.19-05-036

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 7/1/20

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: Dan Marsh
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: 562-805-2083
Facsimile (xxx) xxx-xxxx:
Email: Dan.Marsh@libertyutilities.com

Name:
Title:
Utility Name:
Address:
City: State: California
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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	