



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

July 1, 2020

VIA EMAIL ONLY

**Advice Letter No. 151-E
(U 933-E)**

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

SUBJECT: 2020 Affiliate Transaction Compliance Plan

Purpose

Liberty Utilities (CalPeco Electric) LLC (U 933 E) (“Liberty CalPeco”) hereby submits its 2020 Affiliate Transaction Compliance Plan (“Compliance Plan”) in accordance with the California Public Utilities Commission’s (“Commission”) Decision (D.) 97-12-088, as amended by D.98-08-035, D.98-12-075, D.99-09-002, and D.02-02-046. The attached Compliance Plan presents the most current information for Liberty CalPeco regarding its affiliate transaction compliance efforts.

Background

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

Compliance Plan

This Compliance Plan is responsive to Rule VI.A and describes the manner in which Liberty CalPeco currently has programs and procedures in place to best ensure compliance with the Affiliate Rules by itself and its affiliates. Liberty CalPeco believes that the compliance actions set forth in the attached revised Compliance Plan are consistent and comply fully with the Affiliate Rules. Liberty CalPeco remains committed to upholding both the letter and spirit of the Rules, and respectfully requests that the Commission approve its 2020 Compliance Plan.

Effective Date

In accordance with General Order 96-B, General Rule 7.6.1 and Energy Industry Rule 5.1, Liberty CalPeco submits this Tier 1 Advice Letter with an effective date of July 1, 2020.

Notice

In accordance with General Order 96-B, Section 4.4, a copy of this Advice Letter has been served electronically to the entities shown on the service lists for GO 96-B and R.97-04-011, I.97-04-012, and R.98-04-009, copies of which are attached. The Compliance Plan referenced herein is being provided to the Energy Division Staff only. Other entities may request a copy of the Compliance Plan by sending an email to: Greg.Campbell@libertyutilities.com.

Protests

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or by email, any of which must be received no later than July 21, 2020, 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 be sent via email and U.S. Mail (and by facsimile, if possible) to Liberty Utilities (CalPeco Electric) LLC at the address shown below on the same date it is mailed or delivered to the Commission:

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

Sharon Yang
Liberty Utilities (California)
9750 Washburn Road
Downey, CA 90241-7002
Email: Sharon.Yang@libertyutilities.com

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

Energy Division Tariff Unit
California Public Utilities Commission
July 1, 2020
Page 3

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/ Daniel W. Marsh

Daniel W. Marsh

Manager, Rates and Regulatory Affairs

Email: Dan.Marsh@libertyutilities.com

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

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

VIA EMAIL

gbinge@ktminc.com;
emello@sppc.com;
epoole@adplaw.com;
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;
SDG&ETariffs@semprautilities.com;
greg.campbell@libertyutilities.com;
bcragg@goodinmacbride.com;

AdviceTariffManager@sce.com;
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@kinectenergy.com