



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

July 1, 2021

**VIA EMAIL ONLY**

**Advice Letter No. 174-E  
(U 933-E)**

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

**SUBJECT: 2021 Affiliate Transaction Compliance Plan**

**Purpose**

Liberty Utilities (CalPeco Electric) LLC (U 933 E) (“Liberty”) hereby submits its 2021 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 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 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 currently has programs and procedures in place to comply with the Affiliate Rules by itself and its affiliates. Liberty believes that the compliance actions set forth in the attached revised Compliance Plan are consistent and comply fully with the Affiliate Rules. Liberty remains committed to upholding both the letter and spirit of the Rules, and respectfully requests that the Commission approve its 2021 Compliance Plan.

**Effective Date**

In accordance with General Order 96-B, General Rule 7.6.1 and Energy Industry Rule 5.1, Liberty submits this Tier 1 Advice Letter with an effective date of July 1, 2021.

**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: [Christina.Pak@libertyutilities.com](mailto:Christina.Pak@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, 2021, 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 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](mailto:Dan.Marsh@libertyutilities.com)

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

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 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@regintluc.com

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG

R9804009 LIST

\*\*\*\*\* PARTIES \*\*\*\*\*

Ron Knecht  
ADVOCATES FOR THE PUBLIC INTEREST  
(API)  
1009 SPENCER ST  
CARSON CITY NV 89703-5422  
(650) 968-0115  
ronknecht@aol.com  
For: Consumers for the Public Interest

---

Patrick Mcdonnell  
AGLAND ENERGY SERVICES, INC.  
2000 NICASIO VALLEY RD.  
NICASIO CA 94946  
(415) 662-6944  
pcmcdonnell@earthlink.net

Evelyn Kahl  
ALCANTAR & KAHL, LLP  
345 CALIFORNIA ST., STE. 2450  
SAN FRANCISCO CA 94104  
(415) 403-5542  
ek@a-klaw.com  
For: Texaco, Inc, Amoco Production Co. & Amoco  
Energy Trading Corp.

---

Michael Alcantar  
Attorney At Law  
ALCANTAR & KAHL, LLP  
1300 SW FIFTH AVENUE, SUITE 1750  
PORTLAND OR 97201  
(503) 402-9900  
mpa@a-klaw.com  
For: Cogeneration Association of California

---

\_Catherine E. Yap  
BARKOVICH AND YAP  
PO BOX 11031  
OAKLAND CA 94611  
(510) 450-1270  
cathy@barkovichandyap.com

Bernard Palk  
Public Service Department  
CITY OF GLENDALE  
141 NORTH GLENDALE AVENUE 4TH LEVEL  
GLENDALE CA 91206  
(818) 548-2107  
slins@ci.glendale.ca.us

Rufus Hightower  
Department Of Water & Power  
CITY OF PASADENA  
150 SOUTH LOS ROBLES ST., SUITE 200  
PASADENA CA 91101  
(626) 744-4425

Casey Gwinn  
City Attorney  
CITY OF SAN DIEGO  
1200 3RD AVE., STE 1620  
SAN DIEGO CA 92101  
(619) 236-6220  
casey@cityatty.sannet.gov

Frederick M. Ortlieb  
Deputy City Attorney  
CITY OF SAN DIEGO  
1200 THIRD AVENUE, SUITE 1100  
SAN DIEGO CA 92101-4100  
(619) 236-6318  
Fortlieb@SanDiego.gov

Ray Czahar  
5650 GRAVENSTEIN HIGHWAY-RTE 116  
NORTH  
FORESTVILLE CA 95436  
(707) 887-2522  
rczahar@aol.com

Patrick Ferguson  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO CA 94111-6533  
(415) 276-6500  
PatrickFerguson@dwt.com  
For: Nutrosweet Kelco Company

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Ronald V. Stassi  
Public Service Department  
CITY OF BURBANK  
164 WEST MAGNOLIA BOULEVARD  
BURBANK CA 91502  
(818) 238-3651

Ann L. Trowbridge  
Attorney  
DAY CARTER & MURPHY LLP  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO CA 95864  
(916) 246-7303  
ATrowbridge@DayCarterMurphy.com  
For: California Industrial Users; Western Hub  
Properties

---

John W. Leslie, Esq.  
DENTONS US LLP  
EMAIL ONLY  
EMAIL ONLY CA 00000  
(619) 699-2536  
John.Leslie@dentons.com

James W. Mc Tarnaghan  
Attorney At Law  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREYLLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO CA 94111  
(415) 765-8409  
jmct@gmsr.com  
For: Enron Capital & Trade Resources

---

Daniel W. Douglass  
Attorney  
DOUGLASS & LIDDELL  
4766 PARK GRANADA, SUITE 209  
CALABASAS CA 91302  
(818) 961-3001  
Douglass@EnergyAttorney.com  
For: Fair Energy Competition and Trading

Michael B. Day  
Attorney  
GOODIN, MACBRIDE, SQUERI, & DAY, LLP  
505 SANSOME STREET, STE 900

SAN FRANCISCO CA 94111-3133  
(415) 392-7900  
mday@goodinmacbride.com  
For: Wild Goose Storage, Inc.

---

James M. Day Jr.  
DAN L. CARROLL

DOWNEY BRAND SEYMOUR & ROHWER LLP  
555 CAPITOL MALL 10TH FLOOR  
SACRAMENTO CA 95814-4686  
(916) 441-0131

Steven Lehtonen  
GREEN PLUMBERS USA  
4153 NORTHGATE BLVD., STE. 1  
SACRAMENTO CA 95834-1218  
(916) 239-4577  
steve@greenplumbersusa.com  
For: CA Assn of Plumbing/Heating/Cooling  
Contractors

---

Crystal Needham  
Senior Director, Counsel  
EDISON MISSION ENERGY  
3 MACARTHUR PLACE, STE. 100  
SANTA ANA CA 92707

(949) 798-7977  
cneedham@edisonmission.com

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Lynn Haug  
Attorney At Law  
ELLISON, SCHNEIDER & HARRIS, LLP  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO CA 95816-5905  
(916) 447-2166  
lmh@eslawfirm.com  
For: Independent Energy Producers Ass/DEPT OF  
GENERAL SVCS.

---

Norman A. Pedersen  
Attorney At Law  
HANNA AND MORTON, LLP  
444 SOUTH FLOWER STREET, SUITE 1500  
LOS ANGELES CA 90071  
(213) 430-2510  
npedersen@hanmor.com  
For: Southern California Utility Power Pool

---

Norman J. Furuta  
Attorney  
FEDERAL EXECUTIVE  
AGENCIES 1455 MARKET ST.,  
SUITE 1744 SAN FRANCISCO CA  
94103-1399 (415) 503-6994  
norman.furuta@navy.mil  
For: Dept. of Defense

---

James F. Mordah  
Power Department  
IMPERIAL IRRIGATION DISTRICT  
333 EAST BARIONI BLVD.  
IMPERIAL CA 92251  
(619) 339-9144

Dan Bergmann  
INTERSTATE GAS SERVICES, INC.  
1700 N BROADWAY STE. 430  
WALNUT CREEK CA 94596-4028  
(925) 946-9090  
dbergmann@igservice.com

William B. Marcus  
JBS ENERGY, INC.  
311 D STREET, SUITE A  
WEST SACRAMENTO CA 95608  
(916) 372-0534  
bill@jbsenergy.com

MIRANT CANADA ENERGY MARKETING LTD.  
300, 440 SECOND AVE., SW  
CALGARY AB T2P 5E9  
CANADA

Andy Wuelliner  
KIRKWOOD GAS AND ELECTRIC COMPANY  
PO BOX 1  
KIRKWOOD CA 95646

MRW & ASSOCIATES, LLC  
EMAIL ONLY  
EMAIL ONLY CA 00000  
(510) 834-1999  
mrw@mrwassoc.com  
For: City of San Diego

---

Hugh Larkin  
LARKIN & ASSOCIATES, INC.  
15728 FARMINGTON ROAD  
LIVONIA MI 48154  
(313) 522-3420

Kay Davoodi  
Acq-Utility Rates And Studies Office  
NAVAL FACILITIES ENGINEERING  
COMMAND HQ  
1322 PATTERSON AVE., SE - BLDG 33  
WASHINGTON DC 20374-5018  
(202) 685-3319  
khojasteh.davoodi@navy.mil

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Sara Steck Myers  
Attorney At Law  
LAW OFFICES OF SARA STECK MYERS  
122 - 28TH AVENUE  
SAN FRANCISCO CA 94121  
(415) 387-1904  
ssmyers@att.net

Richard Sperberg  
President  
ONSITE ENERGY CORPORATION  
2701 LOKER AVE W 107  
CARLSBAD CA 92008-6637  
(760) 931-2400  
rsperberg@onsitenergy.com

William H. Booth  
Attorney At Law  
LAW OFFICES OF WILLIAM H. BOOTH  
67 CARR DRIVE  
MORAGA CA 94596  
(925) 296-2460  
wbooth@booth-law.com  
For: California Large Energy Consumers Association  
(CLECA)

---

Matthew Wright  
V. P. Regulation  
PACIFICORP  
825 NE MULTNOMAH, SUITE 800  
PORTLAND OR 97232  
(503) 813-6015  
matthew.wright@Pacificorp.com

Charles Doering  
Principal Executive Consultant  
RESOURCE MANAGEMENT  
INTERNATIONAL, INC.  
225 W. BROADWAY, SUITE 4004  
GLENDALE CA 91204  
(818) 244-0117  
charles\_doering@rmiinc.com  
For: Pan Alberta Limited

---

Elias G. Farrah  
BRUCE W. NEELY  
LE BOEUF LAMB GREENE & MACRAE, LLP  
1875 CONNECTICUT AVE., N.W. SUITE 1200  
WASHINGTON DC 20009

Michael Rochman  
Managing Dir.  
SCHOOL PROJECT UTILITY RATE  
REDUCTION  
1850 GATEWAY BLVD., STE. 235  
CONCORD CA 94520  
(925) 743-1292  
service@spurr.org  
For: SPURR & REGIONAL ENERGY  
MANAGEMENT COALITION

---

Scott Logan  
Office of Ratepayer Advocates  
RM. 4108  
505 Van Ness Avenue  
San Francisco CA 94102 3298  
(415) 703-1418  
sjl@cpuc.ca.gov

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Bruce J. Williams  
SEMPRA ENERGY  
101 ASH STREET  
SAN DIEGO CA 92101  
(619) 696-4488  
BWilliams@SempraUtilities.com  
For: SEMPRA ENERGY

Seth D. Hilton  
Attorney At Law  
STOEL RIVES LLP  
THREE EMBARCADERO CENTER, STE. 1120  
SAN FRANCISCO CA 94111  
(415) 617-8913  
sdhilton@stoel.com

---

Elena Mello  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL RD.  
RENO NV 89511  
(775) 834-5696  
emello@sppc.com

John R. Staffier  
STUNTZ & DAVIS  
555 ELEVENTH ST., N.W. SUITE 550  
WASHINGTON DC 20004  
(202) 662-6780  
jstaffier@sdsatty.com  
For: PAN ALBERTA GAS LTD

June M. Skillman  
Consultant  
2010 GREENLEAF STREET  
SANTA ANA CA 92706  
(909) 280-9411  
jskillman@prodigy.net

---

Keith Mccrea  
Attorney At Law  
SUTHERLAND, ASBILL & BRENNAN  
1275 PENNSYLVANIA AVENUE, NW  
WASHINGTON DC 20004-2415  
(202) 383-0705  
keith.mccrea@sablaw.com

David E. Van Iderstine  
Attorney At Law  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, ROOM 345  
ROSEMEAD CA 91770  
(626) 302-3121  
david.vaniderstine@sce.com

Bob Finklestein  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO CA 94103  
(415) 929-8876  
bfinkelstein@turn.org

Thomas K. Braun  
Attorney At Law  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD CA 91770  
(626) 302-4413  
thomas.braun@sce.com

Marcel Hawiger  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO CA 94103  
(415) 929-8876  
marcel@turn.org  
For: The Utility Reform Network (TURN)

---

Joe F. Young  
SOUTHERN CALIFORNIA WATER COMPANY  
630 EAST FOOTHILL BLVD.  
SAN DIMAS CA 91773  
(714) 394-3677



\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

\*\*\*\*\* STATE EMPLOYEE \*\*\*\*\*

Catherine Mazzeo  
Assistant General Counsel  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS NV 89150-0002  
(702) 876-7250  
catherine.mazzeo@swgas.com  
For: Southwest Gas Corporation

Faline Fua  
Communications Division  
AREA 3-D  
505 Van Ness Avenue  
San Francisco CA 94102 3298  
(415) 703-1989  
fua@cpuc.ca.gov

John Rozsa  
SENATE ENERGY UTILITIES &  
COMMUNICATIONS  
STATE CAPITOL  
SACRAMENTO CA 95814

Linda J. Dondanville  
Consultant  
5342 WINDING VIEW TRAIL  
SANTA ROSA CA 95404  
(707) 528-8151

\*\*\*\*\* INFORMATION ONLY \*\*\*\*\*

Marc D. Joseph  
ADAMS, BROADWELL, JOSEPH & CARDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO CA 94080  
(650) 589-1660  
MDJoseph@AdamsBroadwell.com

Donald C. Liddell  
DOUGLASS & LIDDELL  
EMAIL ONLY  
EMAIL ONLY CA 00000  
(619) 993-9096  
liddell@energyattorney.com

Edward G. Poole  
Attorney  
ANDERSON & POOLE  
601 CALIFORNIA STREET, SUITE 1300  
SAN FRANCISCO CA 94108-2818  
(415) 956-6413 X-102  
epoole@adplaw.com

Jeffery D. Harris  
Attorney At Law  
ELLISON, SCHNEIDER & HARRIS  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO CA 95816-5905  
(916) 447-2166  
jdh@eslawfirm.com

Cathy Keuther  
Ann Constable  
BOSTON EDISON CORPORATION  
800 BOYLESTON STREET  
BOSTON MA 02199

Albert K. Davies  
Director Of Project Development  
ENRON WIND DEVELOPMENT CORP.  
1710 HAPPY VALLEY ROAD  
SANTA ROSA CA 95409

Stephen B. Bowen  
BOWEN LAW GROUP  
5811 SCARBOROUGH DR., STE. 201  
OAKLAND CA 94611-2721  
(415) 394-7500  
steve.bowen@bowenlawgroup.com

Gregory T. Blue  
ENXCO DEVELOPMENT CORP  
5000 EXECUTIVE PARKWAY  
SAN RAMON CA 94583  
(925) 242-0168 X20  
gblue@enxco.com

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Scott Blaising  
BRAUN BLAISING MCLAUGHLIN P.C.  
EMAIL ONLY  
EMAIL ONLY CA 00000  
(916) 682-9702  
blaising@braunlegal.com

Terry Mcbride  
BURNS & MCBRIDE  
105 S. MARKET STREET  
WILMINGTON DE 19801

Jason Mihos  
Regulatory Correspondent  
CALIFORNIA ENERGY MARKETS  
517B POTRERO AVE  
SAN FRANCISCO CA 94110-1431  
(415) 824-3222  
jasonm@newsdata.com

Richard Hamilton  
Attorney At Law  
LAW OFFICES OF RICHARD L. HAMILTON  
7 PARKCENTER DR.  
SACRAMENTO CA 95825-5407  
(916) 484-7646  
hylaw@pacbell.net

Fay A. Chu  
Deputy City Attorney  
LOS ANGELES CITY ATTORNEY'S OFFICE  
111 NORTH HOPE JFB 340  
LOS ANGELES CA 90012  
(213) 367-4580  
fchu@legal.ladwp.com

Alvin Chan  
LOS ANGELES DEPT. OF WATER & POWER  
PO BOX 5 1111, SUITE 340  
LOS ANGELES CA 90051-0100  
(213) 367-4500

Todd S. Glassey  
EMAIL ONLY  
EMAIL ONLY CA 00000  
tglassey@certichron.com

David Jarrat  
PO BOX 7880  
SAN FRANCISCO CA 94120

Brenda Jordan  
9 ROSCOE STREET  
SAN FRANCISCO CA 94110-5921  
(415) 824-3222

Kayode Kajopaiye  
Division of Water and Audits  
RM. 3105  
505 Van Ness Avenue  
San Francisco CA 94102 3298  
(415) 703-2279  
kok@cpuc.ca.gov

Stacy W. Walter  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B30A  
SAN FRANCISCO CA 94105  
(415) 973-6611  
sww9@pge.com  
For: PACIFIC GAS AND ELECTRIC COMPANY

---

Cathie Allen  
Regulatory Mgr.  
PACIFICORP  
EMAIL ONLY  
EMAIL ONLY OR 00000  
(503) 813-5934  
CaliforniaDockets@pacificorp.com

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Scott Tomashefsky  
NORTHERN CALIFORNIA POWER AGENCY  
651 COMMERCE DRIVE  
ROSEVILLE CA 95678-6420  
(916) 781-4291  
scott.tomashefsky@ncpa.com

Ann H. Kim  
PACIFIC GAS AND ELECTRIC COMPANY  
LAW DEPT  
77 BEALE STREET, RM 3105 / PO BOX 7442  
SAN FRANCISCO CA 94120  
(415) 973-7467  
AHK4@pge.com

Michael Chinen  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE, B28K  
SAN FRANCISCO CA 94105-1814  
mtcc@pge.com

Regulatory File Room  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO CA 94120  
(415) 973-4295  
CPUCCases@pge.com

Helen W. Yee  
Legal Division  
RM. 5034  
505 Van Ness Avenue  
San Francisco CA 94102 3298  
(415) 703-2474  
yee@cpuc.ca.gov

Connie Silveria  
SIERRA PACIFIC POWER COMPANY  
LEGAL DEPARTMENT  
6100 NIEL RD.  
RENO NV 89520

Case Administration  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE  
ROSEMEAD CA 91770  
(626) 302-3101  
case.admin@sce.com

Hugh Yao  
SOUTHERN CALIFORNIA GAS COMPANY  
EMAIL ONLY  
EMAIL ONLY CA 00000  
(213) 244-3619  
HYao@SempraUtilities.com  
For: SOUTHERN CALIFORNIA GAS COMPANY

---

Valerie Ontiveroz  
Regulatory Mgr / California  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD, LVB-105  
LAS VEGAS NV 89150-0002  
(720) 876-7323  
valerie.ontiveroz@swgas.com

Les Saffil  
SSP NORTHRIDGE GAS SHUT-OFF VALVE CO.  
5520 SHENANDOAH AVENUE  
LOS ANGELES CA 90056  
(310) 645-6877  
lsaffil@flash.net

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

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R9804009 LIST

\*\*\*\*\* PARTIES \*\*\*\*\*

Evelyn Kahl  
ALEXIS WODTKE  
ALCANTAR & KAHL, LLP  
345 CALIFORNIA ST., STE. 2450  
SAN FRANCISCO CA 94104  
(415) 403-5542  
ek@a-klaw.com  
For: INDICATED PRODUCERS

James W. Mc Tarnaghan  
JEANNE BENNETT  
Attorney At Law  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREYLLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO CA 94111  
(415) 765-8409  
jmct@gmsr.com  
For: ENRON CORP.

---

Jacqueline Mittelstadt  
CITY OF SAN DIEGO  
OFFICE OF THE CITY ATTORNEY  
1200 THIRD AVENUE, SUITE 1100  
SAN DIEGO CA 92101-4100  
(619) 533-5800  
For: CITY OF SAN DIEGO

---

Steven Lehtonen  
BRUCE D. RUDMAN BDRUDMAN@AOL.COM  
GREEN PLUMBERS USA  
4153 NORTHGATE BLVD., STE. 1  
SACRAMENTO CA 95834-1218  
(916) 239-4577  
steve@greenplumbersusa.com  
For: CA Assn of Plumbing Heating Cooling  
Contractors

---

Christopher T. Ellison  
ANDREW B. BROWN  
Attorney At Law  
ELLISON & SCHNEIDER  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO CA 95816-5905  
(916) 447-2166  
cte@eslawfirm.com  
For: CALIFORNIA DEPT. GENERAL SERVICES

---

Norman A. Pedersen  
Attorney At Law  
JONES DAY REAVIS & POGUE  
555 WEST FIFTH ST., STE. 4600  
LOS ANGELES CA 90013-1025  
napedersen@jonesday.com  
For: SOUTHERN CALIFORNIA UTILITY POWER  
POOL (SCUPP)

---

Gregory T. Blue  
ENXCO DEVELOPMENT CORP.  
5000 EXECUTIVE PARKWAY, STE 140  
SAN RAMON CA 94583  
(925) 242-0168 X20  
gblue@enxco.com  
For: NATURAL GAS CLEARINGHOUSE and  
ELECTRIC CLEARINGHOUSE, INC.

---

Robert B. Weisenmiller, Ph.D.  
MRW & ASSOCIATES, LLC  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND CA 94612  
(510) 834-1999  
mrw@mrwassoc.com  
For: MRW & ASSOCIATES, INC./CITY OF SAN  
DIEGO

---

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

James D. Squeri  
Attorney At Law  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREYLLP  
505 SANSOME STREET, STE 900  
SAN FRANCISCO CA 94111  
(415) 765-8443  
jsqueri@goodinmacbride.com  
For: QST Energy Inc. and Energy Users Forum

---

Matthew Wright  
V. P. Regulation  
PACIFICORP  
825 NE MULTNOMAH, SUITE 800  
PORTLAND OR 97232  
(503) 813-6015  
matthew.wright@Pacifcorp.com  
For: PACIFICORP

---

Laura L. Murrell  
Vice President, Regulatory Affairs  
PG&E ENERGY SERVICES  
1100 LOUISIANA ST STE 1000  
HOUSTON TX 77002  
(713) 371-6730  
laura.murrell@pgees.com  
For: PG&E ENERGY SERVICES

---

Paul A. Szymanski  
JAMES WALSH/JOE KLOBERDANZ  
Sr. Counsel  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURTY PARK CT., CP32D  
SAN DIEGO CA 92123  
(858) 654-1732  
PSzymanski@SempraUtilities.com  
For: SAN DIEGO GAS & ELECTRIC CO.

---

\*\*\*\*\* STATE EMPLOYEE \*\*\*\*\*

Scott Logan  
Office of Ratepayer Advocates  
RM. 4108  
505 Van Ness Avenue  
San Francisco CA 94102 3298  
(415) 703-1418  
sjl@cpuc.ca.gov  
For: OFFICE OF RATEPAYER ADVOCATES

Bruce J. Williams  
SEMPRA ENERGY  
101 ASH STREET, HQ14A  
SAN DIEGO CA 92101  
(619) 696-4488  
BWilliams@SempraUtilities.com  
For: SEMPRA ENERGY

---

\*\*\*\*\* INFORMATION ONLY \*\*\*\*\*

Vickiren S. Aeschleman  
SUITE 300  
300 HAMILTON BOULEVARD  
PEORIA IL 61602  
For: QST ENERGY, INC.

---

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

David E. Van Iderstine  
Attorney At Law  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, ROOM 345  
ROSEMEAD CA 91770  
(626) 302-3121  
david.vaniderstine@sce.com  
For: SOUTHERN CALIFORNIA EDISON  
COMPANY

---

John C. Walley  
Attorney At Law  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS NV 89193-8510  
(702) 876-7182  
johnwalley@swgas.com  
For: SOUTHWEST GAS CORPORATION

---

Robert Finkelstein  
PAUL STEIN  
THE UTILITY REFORM NETWORK  
268 BUSH STREET, PMB 3933  
SAN FRANCISCO CA 94104-3503  
(415) 929-8876 X307  
bfinkelstein@turn.org  
For: THE UTILITY REFORM NETWORK (TURN)

---

Scott Blaising  
BRAUN BLAISING MCLAUGHLIN P.C.  
EMAIL ONLY  
EMAIL ONLY CA 00000  
(916) 682-9702  
blaising@braunlegal.com

Jason Mihos  
Regulatory Correspondent  
CALIFORNIA ENERGY MARKETS  
517B POTRERO AVE  
SAN FRANCISCO CA 94110-1431  
(415) 824-3222  
jasonm@newsdata.com  
For: CALIFORNIA ENERGY MARKETS

---

Legal & Regulatory Department  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
250 OUTCROPPING WAY  
FOLSOM CA 95630  
e-recipient@caiso.com  
For: CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR

---

Anthony Ivancovich  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
250 OUTCROPPING WAY  
FOLSOM CA 95630-8773  
(916) 608-7135  
aivancovich@caiso.com  
For: The University of California and the California  
State University

---

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Ronald V. Stassi  
BRUNO J. EIDER  
Public Service Department  
CITY OF BURBANK  
164 WEST MAGNOLIA BOULEVARD  
BURBANK CA 91502  
(818) 238-3651  
For: CITY OF BURBANK - PUBLIC SERVICE  
DEPARTMENT

---

Barnard V. Palk  
CITY OF GLENDALE - PUBLIC SERVICE  
DEPART  
141 NORTH GLENDALE AVENUE, 4TH LEVEL  
GLENDALE CA 91206  
(818) 548-2107  
For: CITY OF GLENDALE - PUBLIC SERVICE  
DEPARTMENT

---

Rufus Hightower  
Department Of Water & Power  
CITY OF PASADENA  
150 S. LOS ROBLES ST., STE 200  
PASADENA CA 91101  
(626) 744-4425  
eklinkner@ci.pasadena.ca.us  
For: CITY OF PASADENA - DEPARTMENT OF  
WATER & POWER

---

Ray Czahar  
5650 GRAVENSTEIN HIGHWAY-ROUTE 116  
NORTH  
FORESTVILLE CA 95436  
(707) 887-2522  
rczahar@aol.com  
For: Ray Czahar

---

Ron Knecht  
ECONOMICS & TECH ANALYSIS GROUP  
1009 SPENCER ST  
CARSON CITY NV 89703-5422  
(650) 968-0115  
ronknecht@aol.com  
For: Ron Knecht

---

Carolyn M. Kehrein  
ENERGY MANAGEMENT SERVICES  
2602 CELEBRATION WAY  
WOODLAND CA 95776  
(530) 668-5600  
cmkehrein@ems-ca.com  
For: ENERGY USERS FORUM

---

Norman J. Furuta  
FEDERAL EXECUTIVE  
AGENCIES 1455 MARKET ST.,  
SUITE 1744 SAN FRANCISCO CA  
94103-1399 (415) 503-6994  
norman.furuta@navy.mil  
For: FEDERAL EXECUTIVE AGENCIES

---

J  
oe Rowley  
IMPERIAL IRRIGATION DISTRICT  
333 EAST BARIONI BOULEVARD  
IMPERIAL CA 92251  
(760) 339-9203

jrowley@iidpwr.com  
For: IMPERIAL IRRIGATION DISTRICT

---

Sam K. Abdulaziz  
LAW OFFICES OF ABDULAZIZ & GROSSBART  
PO BOX 15458  
NORTH HOLLYWOOD CA 91615  
(818) 780-2000  
For: California Association of Plumbing Heating  
Cooling Contractors

---

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Patrick Ferguson  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO CA 94111-6533  
(415) 276-6500  
PatrickFerguson@dwt.com  
For: NUTRASWEET/KELCO/QST ENERGY  
INC/ENERGY USERS FORUM

---

Alvin Chan  
LOS ANGELES DEPT. OF WATER & POWER  
PO BOX 5 1111, SUITE 340  
LOS ANGELES CA 90051-0100  
(213) 367-4500  
For: LOS ANGELES DEPARTMENT OF WATER  
& POWER

---

Gregory S.G. Klatt  
DOUGLASS & LIDDELL  
EMAIL ONLY  
EMAIL ONLY CA 00000  
(818) 961-3001  
klatt@energyattorney.com  
For: Southern California Utility Power Pool

---

Nancy I. Day  
Sr Vp, Gov'T & Regulatory Relations  
NEW ENERGY VENTURES, LLC  
1000 WILSHIRE BOULEVARD, STE 500  
LOS ANGELES CA 90017  
(213) 614-8000  
nday@newenergy.com

Scott Tomashefsky  
NORTHERN CALIFORNIA POWER AGENCY  
651 COMMERCE DRIVE  
ROSEVILLE CA 95678-6420  
(916) 781-4291  
scott.tomashefsky@ncpa.com

Theresa Cho  
PG&E ENERGY SERVICES  
345 CALIFORNIA ST. 32ND FLOOR  
SAN FRANCISCO CA 94104  
(415) 733-4835  
theresa.cho@pgees.com



\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 17-JUN-2016 by: JVG  
R9804009 LIST

Jim Solberg  
SPURR  
1850 GATEWAY BLVD., STE. 235  
CONCORD CA 94520-7929

THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO CA 94103  
(415) 929-8876

Regina Costa  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO CA 94103  
(415) 929-8876 X312  
rcosta@turn.org



# 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 #: 562-299-5104

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) #: 174-E

Tier Designation: 1

Subject of AL: 2020 Affiliate Transaction Compliance Plan

Keywords (choose from CPUC listing): Affiliate

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.97-12-088

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: 7/1/21

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:

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: 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: AnnMarie Lett  
Title: Coordinator  
Utility Name: Liberty Utilities (California)  
Address: 9750 Washburn Road  
City: Downey State: California  
Telephone (xxx) xxx-xxxx: 562-923-0711  
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	