



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
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December 6, 2021

VIA EMAIL ONLY

**Advice Letter 185-E
(U 933-E)**

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

Subject: Compliance Advice Letter Pursuant to Ordering Paragraphs 3 and 5 of Resolution E-5168

Purpose

Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty”) submits this Tier 1 Advice Letter with updates to its Rule 24 and Preliminary Statement Part 13.P, *Electric Vehicle Infrastructure Memorandum Account* (EVIMA) tariff. The revised tariff sheets reflect changes required per ordering paragraphs (OP) 3, and OP 5, (Tier 1 Advice Letter), and OP 4 (Tier 2 Advice Letter), and are attached hereto.

Background

On October 7th, 2021, the California Public Utilities Commission (CPUC) adopted Resolution E-5168 (“Resolution”), finding the proposed Rule 24 and EVIMA to be reasonable with modifications, and in compliance with Assembly Bill 841. OP 3 of the Resolution requires submission of a Tier 1 Advice Letter within 60 days of adoption to address modifications to Rule 24. OP 5 of the Resolution requires the updated EVIMA capturing common cost categories to be included in the Tier 1 advice letter.

Proposed Modifications to Rule 24

The following proposed Tier 1 Advice Letter updates to Liberty’s Rule 24, per OP 3 of the Resolution, are listed in order of appearance in the tariff:

Section	New Text Added
Applicability Section	“EV infrastructure installations will be considered qualified if they meet the safety requirements of the Transportation Electrification Safety Checklist related to utility-side infrastructure adopted via California Public Utilities Commission Decision (D.)18-09-034.”
Applicability Section	“As a default, participants will be enrolled on Liberty's commercial time-variant electric vehicle rate. Customers may elect to change to another applicable time-variant rate after initial enrollment.”
Applicability Section	“Rule 24 may be revised after the completion of Liberty's 2022 General Rate Case cycle and subsequent to year 2024.”
Section B.2.c.	“SERVICE DELIVERY POINT. Electric Vehicle Supply Extension must extend along the shortest or most practical available route, as necessary to reach a Service Delivery Point identified in the mutual agreement between Liberty and the Applicant.”
Section B.2.d.	“EXISTING SERVICE. As a default, participants are to utilize existing service where technically feasible and cost efficient. Liberty will separately meter EVSE load on a facility’s existing service line by installing a utility-grade meter as a submeter.”
Section F.	“Electric Vehicle: An electric vehicle is any vehicle that utilizes electricity from external sources of electrical power, including the grid, for all or part of vehicles, vessels, trains, boats, or other equipment (e.g., aircraft, forklifts, port equipment) that are mobile sources of air pollution and greenhouse gases. Types of electric vehicles include, but are not limited to, plug-in hybrid electric vehicles (PHEV), battery electric vehicles (BEV), electric golf carts, or neighborhood electric vehicles (NEV), transit buses, drayage, vocation, short-haul fleets, port applications, ground equipment supporting goods movement, ground support equipment at airports, and long-haul truck stop applications to minimize the idling of diesel engines.”
Section G.	“NO EFFECT ON OTHER TE PROGRAMS. Infrastructure provided pursuant to this Rule 24 does not alter or diminish the Commission’s authority under Public Utilities Code section 740.12(b) (or any other similar statute) to direct electrical corporations to file applications for transportation electrification programs and investments, or to approve or modify the terms and conditions of such programs and investments.”

Comparison of Costs and Responsibilities Assigned to Liberty and to the Applicant for Rule 15, Rule 16, and Rule 24

The table below shows a comparison of costs and responsibilities for Liberty and Applicants for Rule 15, Rule 16, and Rule 24 as modified by the proposed tariff updates.

	Utility-assigned Responsibilities	Applicant-assigned Responsibilities
Rule 15	Cost of facilities in excess of those which would have been adequate to provide the requested service.	The base cost of all extensions and alterations made hereunder shall include Utility's costs for all regulatory, environmental and other fees, engineering, inspection, material, labor, transportation, costs for removal of existing facilities less their salvage value, associated overheads and other charges which are related to the extension or alteration, including any modification or improvement of existing facilities which is required to provide the requested service.
Rule 16	<ul style="list-style-type: none"> • Underground Service • Riser Materials • Overhead Service • Metering • Transformer • Special Conduit Installations • Cable-In-Conduit • Government Inspection • Utility Performed Work Requested by Applicant 	<ul style="list-style-type: none"> • Clear Route • Excavation • Conduit and substructures • Protective Structures • Applicant's Facility Design and Operation • Required Service Equipment • Coordination of Electrical Protective Devices • Liability • Facility Tampering • Space for Transformers • Padmounted Equipment • Transformer Room or Vault • Transformer Lifting Requirements • Building Code Requirements • Reasonable Care • Applicant Performed Work in

		Accordance with Rule 15
Rule 24	<ul style="list-style-type: none"> • Excavation • Conduit and Substructures • Protective Structures • Underground Service • Riser Materials • Overhead Services • Metering • Transformer • Other Required Electric Distribution Infrastructure • Government Inspection • Design and Installation Work 	<ul style="list-style-type: none"> • Clear Route • Behind the Meter Equipment • Environmental Studies or Issue Mitigation • Coordination of Protection Devices • Liability • Facility Tampering • Building Code Requirements • Reasonable Care

Common Cost Categories

Liberty, to the extent possible, will align with the other electric utilities in using the FERC Uniform System of Accounting (USoA) for categorizing and reporting purposes. It should be noted that Liberty’s asset accounting system does not track capital project costs at the level prescribed in OP 3.h. of the resolution. The common cost categories listed includes: “poles, vaults, service drops, transformers, mounting pads, trenching, conduit, cables, meters, other necessary equipment, and associated indirect labor costs for engineering and construction work.” In addition, unallocated project costs for labor and other overheads are only allocated to FERC accounts once the project is complete and ready for service. Liberty requests that the reporting of project expenditures while in Construction Work in Progress (CWIP) is at the level the costs accumulate in Liberty’s work order system. For EV projects completed, Liberty will report project cost details that align the common cost categories with the associated FERC account.

Revenue Requirement and Rate Impact through Year-end 2024

Liberty does not currently have any projects that would qualify for service under Rule 24. Liberty’s 2022 General Rate Case (GRC), did not include any eligible Rule 24 projects for which Liberty would request relief. Any impact on rates will be addressed in the subsequent 2025 GRC application. It is uncertain how many customers or what types of projects will be participating in implementing EV infrastructure through Rule 24 in Liberty’s service territory. As such, Liberty would be providing speculative and unreliable information if it were to forecast a revenue requirement and rate impact at this time.

Preliminary Statement for EVIMA Updates

Liberty proposes the following update to Preliminary Statement 13.P., EVIMA:

Electric Vehicle Infrastructure project costs includes excavation, trenching, and backfilling, conduit and substructures, transformers, cables, services, in addition to any other unspecified equipment owned by Liberty and necessary for the installation of electrical distribution infrastructure. In addition, associated design, engineering, and construction work is to be considered core utility business and treated the same as other distribution infrastructure.

Effective Date

Liberty requests that this Tier 1 advice letter be effective as of December 6, 2021.

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 December 26, 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, 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 to Liberty 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

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 list.

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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
Senior Manager, Rates and Regulatory Affairs

Attachments

cc: Liberty Advice Letter Service List
Service List R.18-12-006

RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

APPLICABILITY: This rule is applicable to all separately metered Electric Vehicle (EV) charging infrastructure installations with the exception of single-family homes, and Incidental Load. This rule supports all Electric Distribution Infrastructure on the utility side of the Customer’s meter (EV Service Extension) for Commercial and Multi-family Unit Dwelling Customers (Applicant) installing separately-metered infrastructure to support EV Supply Equipment. To be eligible for this rule, Applicant must purchase and install qualified EV Supply Equipment in the quality approved by utility in utility’s sole discretion.

EV infrastructure installations will be considered qualified if they meet the safety requirements of the Transportation Electrification Safety Checklist related to utility-side infrastructure adopted via California Public Utilities Commission Decision (D.)18-09-034. Proof of commitment to install the EVSE is required from all applicants. A proof of commitment is any documentation of clear intent to procure and deploy EVSE, including but not limited to a purchase order, budget approval, grant agreement, request for proposal results, governance-body mandated procurement and deployment, approved site plan where the EVSE will be installed, local government permit, etc. Applicant must agree to maintain and operate the EV Charging Stations associated with this rule for a period of five years. After utility has completed all utility-side work, Applicant must install and energize all customer-side equipment including the EV Charging Stations within a timeframe agreed upon between the utility and the Applicant. The Applicant is required to notify the utility when the EV Charging Stations are energized.

(N)

Utility will validate the installation of the EV Charging Stations after energization. The frequency and type of review may vary. Utility may conduct an in-person examination or validate the installation using meter data. Utility may periodically validate that the EV Charging Stations remains in use via validating meter data or in-person examination.

Customers taking service under this Rule must agree to remedy any maintenance or reliability issues promptly to ensure that the EV Charging Stations are functional and available for charging. Applicant must agree to maintain the EV Charging Stations for at least five years and to set aside funding to support maintenance and operations.

Failure to comply with these terms may, at utility discretion, result in termination of the contract and discontinuation of service or de-energization of the EV infrastructure. The utility may also pursue reimbursement of the costs incurred in connection with deploying the utility-side EV infrastructure and any costs associated with the removal of the utility-side EV infrastructure.

As a default, participants will be enrolled on Liberty’s commercial time-variant electric vehicle rate. Customers may elect to change to another applicable time-variant rate after initial enrollment.

(N)

This rule is not applicable to distribution line extensions, which shall be installed in accordance with Rule 15, Electric Line Extensions. Rule 24 may be revised after the completion of Liberty’s General Rate Case cycle, and subsequent to year 2024.

(T)
(T)

A. GENERAL

1. **DESIGN.** Utility will be responsible for planning, designing, and engineering its EV Service Extension Facilities using Utility’s standards for design, materials and construction.
2. **SERVICE DELIVERY POINT.** For the purposes of this rule the Service Delivery Point is defined as the utility-owned meter.

(continued)

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RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

C. RESPONSIBILITIES FOR EV SERVICE EXTENSION

(L)

1. **APPLICANT RESPONSIBILITY.** In accordance with utility's design, specifications and requirements for the installation of EV Service Extension, subject to utility's inspection and approval, Applicant is responsible for:

a. **CLEAR ROUTE.** Providing (or paying for) a route on any private property that is clear of obstructions which would inhibit the construction of EV Service Extension.

(T)
(L)

b. **BEHIND THE METER EQUIPMENT.** Applicant shall, at its sole liability, risk, and expense, be responsible to furnish, install, own, maintain, inspect, and keep in good and safe condition, all Electric Distribution Infrastructure beyond the utility meter required to provide EV charging services at premise, inclusive of EV Supply Equipment, inclusive of the meter panel.

(D)
(T)

c. **ENVIRONMENTAL STUDIES OR ISSUE MITIGATION.** Environmental studies or issue mitigation may be required by the utility to install the EV Service Extension, the cost of which will be borne by the Applicant.

(T)

d. **COORDINATION OF PROTECTION DEVICES.** When, as determined by utility, Applicant's load is of sufficient size as to require coordination of response time characteristics between Applicant's electrical protective devices (circuit breakers, fuses, relays, etc.) and those of utility, it shall be Applicant's responsibility to provide such coordination in accordance with Rule 2.

(T)

e. **LIABILITY.** Utility shall incur no liability whatsoever, for any damage, loss or injury occasioned by:

(T)

1. Applicant-owned equipment or Applicant's transmission and delivery of energy or,

2. The negligence, omission of proper protective devices, want of proper care, or wrongful act of Applicant, or any agents, employees, or licensees of Applicant, on the part of Applicant in installing, maintaining, using, operating, or interfering with any such conductors, lines, machinery, or apparatus.

f. **FACILITY TAMPERING.** Applicant shall provide a suitable means acceptable to utility for placing its seals on meter rings and covers of service enclosures and instrument transformer enclosures which protect unmetered energized conductors installed by Applicant. All utility-owned meters and enclosure covers will be sealed only by utility's authorized employees and such seals shall be broken only by utility's authorized employees. However, in an emergency, utility may allow a public authority or other appropriate party to break the seal. Any unauthorized tampering with utility-owned seals or connection of Applicant-owned facilities to unmetered conductors at any time is prohibited and is subject to the provisions of Rule 11, Discontinuance of Service, for unauthorized use.

(T)

(N)

(N)
(D)

(continued)

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RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

C. RESPONSIBILITIES FOR EV SERVICE EXTENSION (continued)

- g. **BUILDING CODE REQUIREMENTS.** Any service equipment and other related equipment owned by Applicant, as well as any vault, room, enclosure, or lifting facilities for the installation of transformers shall conform with applicable laws, codes, and ordinances of all governmental authorities having jurisdiction. (T)(L)
- h. **REASONABLE CARE.** Applicant shall exercise reasonable care to prevent Utility's Service Lateral, meters, and other facilities owned by Utility on the Applicant's Premises from being damaged or destroyed, and shall refrain from interfering with utility's operation of the facilities and shall notify utility of any obvious defect. (T)
(L)
- i. **BUILDOUT OF ADDITIONAL CAPACITY.** When Applicant requests and utility agrees to install additional EV Infrastructure beyond the capacity needed to support the EV Charging Stations that the Applicant plans to install at the time of taking initial service, Applicant is required to execute a signed commitment to install the additional planned EV Charging Stations in the future, which includes but is not limited to the approximate number of EV Charging Stations and the expected timeframe of the installation. Failure to install the additional EV Charging Stations as agreed to in the signed commitment may, at utility discretion, result in termination of the contract and discontinuation of service or de-energization of the EV infrastructure. The utility may also pursue reimbursement of the costs incurred in connection with deploying the utility-side EV infrastructure and any costs associated with the removal of the utility-side EV infrastructure. (N)

2. UTILITY RESPONSIBILITY

- a. **EV SERVICE EXTENSION.** Utility will furnish, install, own, and maintain the following: (L)
 - 1. **EXCAVATION.** All necessary trenching, backfilling, and other digging as required including permit fees. (N)
 - 2. **CONDUIT AND SUBSTRUCTURES.** Furnishing, installing, owning, and maintaining all Conduits (including pull wires) and Substructures on Applicant's Premises or utility franchise area (or rights-of-way, if applicable) as necessary to install the EV Service Extensions.
 - 3. **PROTECTIVE STRUCTURES.** Furnishing, installing, owning, and maintaining necessary Protective Structures as specified by utility for utility facilities on Applicant premises. Any decorative or custom protective structures shall be the responsibility of the Applicant to install, own, and maintain. (N)

(continued)

RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

C. RESPONSIBILITIES FOR EV SERVICE EXTENSION (continued)

2. UTILITY RESPONSIBILITY (continued)

- 4. **UNDERGROUND SERVICE.** A set of Service Lateral conductors to supply permanent service from the Distribution Line source to the Service Delivery Point approved by Utility. (T)
- 5. **RISER MATERIALS.** Any necessary pole riser material for connecting underground services to an overhead Distribution Line. (T)
- 6. **OVERHEAD SERVICE.** A set of overhead Service Lateral conductors and support poles to supply permanent service from a Distribution Line source to a suitable support at the Service Delivery Point approved by Utility. Such support shall be of a type and located such that service wires may be stalled in accordance with good engineering practice and in compliance with all applicable laws, ordinances, rules, and regulations including those governing clearances and points of attachment. (T)(L)
- 7. **METERING.** The necessary instrument transformers where required, test facilities, meters, associated metering equipment and the metering enclosures when Utility elects to locate metering equipment at a point that is not accessible to Applicant. (T)
- 8. **TRANSFORMER.** The transformer where required, including any necessary switches, capacitors, electrical protective equipment, etc. When either a pad-mounted or overhead transformer is installed on Applicant's Premises, the Service Lateral shall include the primary conductors from the connection point at the distribution supply line to the transformer and the secondary conductors, if any, from the transformer to the Service Delivery Point. (T)(L)
- 9. **OTHER REQUIRED ELECTRIC DISTRIBUTION INFRASTRUCTURE.** Including but not limited to materials, between the Distribution Line source and Service Delivery Point. (N)(N)(D)
- 10. **GOVERNMENT INSPECTION.** Utility will establish electric service to Applicant following notice from the governmental authority having jurisdiction that the Applicant-owned facilities have been installed and inspected in accordance with any applicable laws, codes, ordinances, rules, or regulations, and are safe to energize. (T)(L)(L)

(continued)

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RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

C. RESPONSIBILITIES FOR EV SERVICE EXTENSION (continued)

3. INSTALLATION

(N)
|
(N)

a. **UTILITY PERFORMED WORK.** Utility will perform all design and installation work required to install EV Service Extension.

D. PAYMENTS BY APPLICANT

1. **PAYMENTS.** Applicant is responsible to pay utility the following non-refundable costs as applicable under this rule and in advance of utility commencing its work:

a. **ENVIRONMENTAL COSTS**

b. **TAX.** Any payments or contribution of facilities by Applicant are taxable Contributions in Aid of Construction (CIAC) and shall include an Income Tax Component of Contribution (ITCC) for state and federal tax at the rate provided in utility's Preliminary Statement.

c. **OTHER.** Any payments for Applicant owned protective structures required in Section C.1.f.

(L)
(T)

2. **REFUNDS.** No refunds apply to the installation of EV Service Extension under this rule.

E. EXISTING SERVICE FACILITIES

1. SERVICE REINFORCEMENT

a. **UTILITY OWNED.** When utility determines that its existing Service Facilities require replacement and are eligible, the existing Service Facilities shall be replaced as new EV Service Extension under the provisions of this rule.

2. **SERVICE RELOCATION OR REARRANGEMENT.** Any relocation or rearrangement, whether utility convenience or applicant convenience, will be installed in accordance with Rule 16, Service Extensions.

3. **IMPAIRED ACCESS AND CLEARANCES.** Determination of impaired access or clearances will be determined, and corrective action conducted in accordance with Rule 16, Service Extensions.

4. OVERHEAD TO UNDERGROUND SERVICE CONNECTIONS

a. **RULE 20.** Where an existing overhead Distribution Line is replaced by an underground distribution system in accordance with Rule 20, Replacement of Overhead with Underground Electric Facilities, new underground services will be installed under Rule 16, Service Extensions.

(L)

(continued)

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ELECTRIC VEHICLE INFRASTRUCTURE

E. EXISTING SERVICE FACILITIES (continued)

b. APPLICANT'S CONVENIENCE. Where overhead services are replaced by underground services for Applicant's convenience, Applicant shall perform all Excavation, furnish and install all Substructures, and pay utility its total estimated installed cost to complete the new service and remove the overhead facilities.

5. DAMAGED FACILITIES. When utility's facilities are damaged by others, the repair will be made by utility at the expense of the party responsible for the damage. Applicants are responsible for repairing their own facilities.

6. SUBDIVISION OF PREMISES. When utility's Service Facilities are located on private property and such private property is subsequently subdivided into separate Premises with ownership divested to other than Applicant or customer, the subdivider is required to provide utility with adequate rights-of-way satisfactory to utility for its existing facilities and to notify property owners of the subdivided Premises of the existence of the rights-of-way.

When adequate rights-of-way are not granted as a result of the property subdivision, utility shall have the right, upon written notice to Applicant, to discontinue service without obligation or liability. The existing owner, Applicant, or customer shall pay to utility the total estimated cost of any required relocation or removal of utility's facilities. A new electric service will be re-established in accordance with the provisions of Section D of Rule 16, Service Extensions for new service and the provisions of any other applicable utility rules.

(L)

7. EXCEPTIONAL CASES. When the application of this rule appears impractical or unjust to either party, or ratepayers, utility or Applicant may refer the matter to the Commission for a special ruling or for approval of special conditions which may be mutually agreed upon.

F. DEFINITIONS

Applicant: A person or agency requesting utility to supply electric service.

Applicant-driven scope of work modification: The modifications required to accommodate the construction and design needs of a new EV Service Extension project for a specific Applicant.

Conduit: Ducts, pipes, or tubes of certain metals, plastics or other materials acceptable to utility (including pull wires and concrete encasement where required) for the installation and protection of electric wires and cables.

Distribution Lines: Utility's overhead and underground facilities which are operated at distribution voltages as set forth in utility's Rule 2 and which is designed to supply two or more services.

(L)

(continued)

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RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

F. DEFINITIONS (continued)

Electric Vehicle: An electric vehicle is any vehicle that utilizes electricity from external sources of electrical power, including the grid, for all or part of vehicles, vessels, trains, boats, or other equipment (e.g., aircraft, forklifts, port equipment) that are mobile sources of air pollution and greenhouse gases. Types of electric vehicles include, but are not limited to, plug-in hybrid electric vehicles (PHEV), battery electric vehicles (BEV), electric golf carts, or neighborhood electric vehicles (NEV), transit buses, drayage, vocation, short-haul fleets, port applications, ground equipment supporting goods movement, ground support equipment at airports, and long-haul truck stop applications to minimize the idling of diesel engines. (N)

Electric Vehicle Electric Distribution Infrastructure: EV Electric Distribution Infrastructure shall consist of (a) vaults, (b) mounting pads, (3) trenching, (4) conduit, (5) other equipment as necessary, and (6) associated engineering and construction work. (N)

Electric Vehicle Service Extension: The EV Service Extension shall consist of Electrical Distribution Infrastructure on the utility-side of the meter

Electric Vehicle Supply Equipment: The equipment that interconnects the electricity grid at a Premises to the Electric Vehicle, whether using alternating current (AC) or direct current (DC), but not including the Electric Distribution Infrastructure.

Excavation: All necessary trenching, backfilling, and other digging as required to install Service Extensions including furnishing of any imported backfill material, concrete encasement to protect conduit, and disposal of spoil, as required, surface repair and replacement, landscape repair and replacement.

Franchise Area: Public streets, roads, highways, and other public ways and places where utility has a legal right to occupy under franchise agreements with governmental bodies having jurisdiction. (L)

Incidental Load: The incidental load is limited to devices directly needed solely to support the EV infrastructure and charging uses of the site itself. The added load included on the EV meter must not include load from any non-EV charging infrastructure facilities, appliances or apparatus.

Invoice: When utility presents and offer to the customer for the EV Service Extension in response to an application for an extension of service submitted pursuant to subdivision (f) of California Public Utilities Code 783. (L)

Issue Mitigation: A process of addressing impacts to the environment caused by human action – notably those resulting from infrastructure projects. Negative environmental impacts should be avoided, for instance by re-siting the project to a more suitable location. If relocation is not feasible and reasonable, cost-efficient science-strong measures should be deployed to minimize harm. (N)

Premises: All of the real property and apparatus employed in a single enterprise on an integral parcel of land undivided, excepting in the case of industrial, agricultural, oil field, resort enterprises, and public or quasi-public institutions, by a dedicated street, highway or public thoroughfare or a railway. Automobile parking lots constituting a part of and adjacent to a single enterprise may be separated by an alley from the remainder of the Premises served. (L)

(continued)

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RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

F. DEFINITIONS (continued)

Protective Structures: Fences, retaining walls (in lieu of grading), sound barriers, posts, barricades and other structures as required by utility.

Service Delivery Point: Where utility's Service Facilities is connected to either Applicant's conductors or other service termination facility designated and approved by utility. For the purposes of this rule the Service Delivery Point is set at the meter.

Service Facilities: Utility's Service Facilities shall consist of (a) primary or secondary underground or overhead service conductors, (b) poles to support overhead service conductors, (c) service transformers, (d) Utility owned metering equipment, and (e) other utility-owned service related equipment.

Substructures: The surface and subsurface structures which are necessary to contain or support utility's electric facilities. This includes but is not limited to conduits, splice boxes, pull boxes, equipment vaults and enclosures, foundations or pads for surface-mounted equipment.

The date the application is approved: The earlier of either the effective date of the contract for the EV Service Extension or the date when the utility first invoices the customer for the extension of service.

G. NO EFFECT ON OTHER TE PROGRAMS

Infrastructure provided pursuant to this Rule 24 does not alter or diminish the Commission's authority under Public Utilities Code section 740.12(b) (or any other similar statute) to direct electrical corporations to file applications for transportation electrification programs and investments, or to approve or modify the terms and conditions of such programs and investments.

(N)
|
(N)

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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: Cindy Fisher

Phone #: 562-805-5191

E-mail: Cindy.Fisher@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) #: 185-E

Tier Designation: 1

Subject of AL: Modification to Rule 24, and Electric Vehicle Infrastructure Memorandum Account ("EVIMA")

Keywords (choose from CPUC listing): Tariffs

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-5168

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: 12/6/21

No. of tariff sheets: 13

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: Rule 24 EVIMA

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: Cindy Fisher
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: 562-805-5191
Facsimile (xxx) xxx-xxxx:
Email: Cindy.Fisher@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:

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	

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Advice Letter Filing Service List
General Order 96-B, Section 4.3

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