



Liberty Utilities (CalPeco Electric) LLC
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January 4, 2023

VIA EMAIL ONLY

EDTariffUnit@cpuc.ca.gov

**Advice Letter 207-E-A
(U 933-E)**

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

Subject: Rate and Bill Impacts of Transportation Electrification Funding Cycle 1

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.”) 22-11-040, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 2 advice letter updating its rate and bill impacts associated with the authorized investments for the Funding Cycle 1 (“FC1”) program for Transportation Electrification (“TE”). This supplemental filing will replace AL 207-E in its entirety.

Purpose

Pursuant to Ordering Paragraph (“OP”) 13 of D.22-11-040, Liberty submits this Tier 2 advice letter to update Liberty’s rate and bill impacts for the authorized investment for FC1.¹

Background

On December 19, 2018, the Commission issued an Order Instituting Rulemaking (“OIR”) to “Continue the Development of Rates and Infrastructure for Vehicle Electrification” (“DRIVE”).² One of the purposes of the DRIVE OIR was for Energy Division Staff to develop and establish a Transportation Electrification Framework (“TEF”), to help guide policies and programs supporting California’s Zero Emission Vehicle (“ZEV”) infrastructure. On September 30, 2020 the Governor signed AB 841 to direct utilities and the Commission to establish new rules that authorize each utility to “design and deploy all electrical distribution infrastructure on the utility side of the customer’s meter for all customers installing separately metered infrastructure to support charging stations, other than those in single-family residences.” On March 1, 2021, Liberty filed Advice Letter 166-E to establish tariff Rule 24, Electric Vehicle Infrastructure, and Preliminary Statement Part 13.P, Electric Vehicle Infrastructure Memorandum Account, to track costs incurred by Liberty associated with Rule 24. This advice letter was approved on October 7, 2021.

¹ D.22-11-040 at p. 232.

² R.18-12-006.

D. 22-11-040 adopts a long-term policy framework for TE behind-the-meter (“BTM”) infrastructure that directs investor-owned utilities (“IOUs”), including Liberty, to jointly fund the program and associated activities. The FC1 framework includes a five-year (2025-2029) funding cycle of \$1 billion between the California electrical corporations. The funding allocation is based on each IOU’s percentage of electric sales for 2024. As detailed in the tables below, Liberty’s share is 0.3%, resulting in a total of \$3.133 million over 5 years.³

Table 1
 IOU’s 2024 Sales and Program Allocation

Proposed Sales and Share	2024 Sales	Share
PG&E	76,286	42.3%
SCE	85,156	47.2%
SDG&E	17,412	9.7%
Bear Valley	134	0.1%
Liberty	565	0.3%
Pacificorp	778	0.4%
Total	180,330	100.0%
Form 1.1c - STATEWIDE		
<i>California Energy Demand 2021-2035 Baseline Forecast - Mid Demand Case</i>		
<i>Electricity Deliveries to End Users by Agency (GWh)</i>		

Table 2
 Summary of Liberty’s FC1 Contribution (000s)

Total Funding from IOUs	\$	1,000,000
Liberty's Allocation		0.31%
Liberty's Contribution	\$	3,133
Annual Increase		627

Of the \$3.133 million, Liberty may only access 60 percent within the first three years. A Mid-Cycle Assessment will be conducted by the Commission to assess progress and may modify or terminate the program if ratepayers are unduly burdened. The analysis does not consider the \$600 million cap for the first three years of FC1 and assumes remaining funds will be released after the Mid-Cycle Assessment.

³ 2024 sales from the California Energy Commission’s 2021 Integrated Energy Policy Report sales forecast.

In 2023, Liberty will start recording and tracking the Program Administrator (“PA”) and Marketing, Education & Outreach (“ME&O”) costs to implement FC1 in a one-way balancing account.

Rate and Bill Impacts

As adopted in D.22-11-040, Liberty will recover costs through distribution rates allocated on an equal cent per kilowatt-hour basis applied equally to all customer classes. Because the total funding is assumed to be equally split for the five years of FC1, the annual impact is the same for each of the five years. The tables below show the annual impact of the FC1 program, average bill impacts, and average rate impacts.

Table 3
 Annual Impact of FC1 Program (000s)

Authorized Base Revenue Requirement	Annual FC1 Funding	Proposed Base Revenue Requirement	Percentage Increase
\$ 68,884	627	69,511	0.91%

Table 4
 Average Bill Impacts

Customer Class	Current Average Bill	Proposed Average Bill	\$ Increase	% Increase
Residential (Permanent)	124.30	125.05	0.74	0.6%
Residential (Non-Primary)	105.32	105.89	0.56	0.5%
Residential (CARE)	89.20	89.86	0.66	0.7%
A-1	359.43	361.16	1.73	0.5%
A-2	5,007.07	5,031.56	24.49	0.5%
A-3	29,476.01	29,597.68	121.67	0.4%
PA	1,036.31	1,043.23	6.91	0.7%
SL	23.90	24.00	0.09	0.4%
OL	18.83	18.93	0.09	0.5%

Table 5
Average Rate Impacts

Customer Class	Current Rates (\$/kWh)	Proposed Rates (\$/kWh)	\$ Increase	% Increase
Residential (Permanent)	0.17516	0.17627	0.00111	0.6%
Residential (Non-Primary)	0.18797	0.18908	0.00111	0.6%
Residential (CARE)	0.14173	0.14284	0.00111	0.8%
A-1	0.21983	0.22094	0.00111	0.5%
A-2	0.15437	0.15548	0.00111	0.7%
A-3	0.12928	0.13039	0.00111	0.9%
PA	0.16345	0.16456	0.00111	0.7%

Tier Designation

Pursuant to General Order (“GO”) 96-B, and D.22-11-040, OP. 13, this Advice Letter is submitted with a Tier 2 designation.

Effective Date

Liberty requests an effective date of February 3, 2023.

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 January 24, 2023, 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:

Energy Division Tariff Unit
California Public Utilities Commission
January 4, 2023
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Liberty Utilities (CalPeco Electric) LLC
Attn: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Email: 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 lists. Address change requests to Liberty's GO 96-B service list should be directed by electronic mail to:
AnnMarie.Sanchez@LibertyUtilities.com.

For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at ProcessOffice@cpuc.ca.gov.

If additional information is required, please do not hesitate to contact me at Cindy.Fisher@libertyutilities.com.

Respectfully submitted,

LIBERTY

/s/ Cynthia Fisher

Cynthia Fisher
Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List
R.18-12-006 Service List

VIA EMAIL

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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: Cynthia Fisher
 Phone #: 530-721-5191
 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) #: 207-E-A

Tier Designation: 2

Subject of AL: Rate and Bill Impacts of Transportation Electrification Funding Cycle 1

Keywords (choose from CPUC listing): Transportation Electrification

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.22-11-040

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: 2/3/23

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: 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: 530-721-5191
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: AnnMarie.Sanchez@libertyutilities.com

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	