



Liberty Utilities (CalPeco Electric) LLC
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December 6, 2021

VIA EMAIL ONLY

**Advice Letter 182-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 Paragraph 4 of Resolution E-5168

Purpose

Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty”) submits this Tier 2 Advice Letter with updates to its Rule 24 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 to be reasonable with modifications, and in compliance with Assembly Bill 841. OP 4 of the Resolution requires submission of a Tier 2 Advice Letter within 60 days of adoption to address modifications to Rule 24.

Proposed Modifications to Rule 24

The following proposed Tier 2 Advice Letter updates to Liberty’s Rule 24, per OP 4 of the Resolution, are listed in order of appearance in the tariff:

Section	New Text Added
Applicability Section	<p>“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.”</p>
Applicability Section	<p>“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.</p> <p>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.</p> <p>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.</p> <p>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.”</p>

Section C.1.i.	<p>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.”</p>
<p>Sections C.1., C.2., C.3. (To reflect requirements per OP 4.b)</p>	<p>“assign the costs for excavation, trenching, and backfilling, conduit and substructures, padmounting equipment, transformer room and vault, and necessary transformer lifting equipment in addition to any other unspecified equipment owned by the utility and necessary for the installation of electrical distribution infrastructure to the utility.”</p>
Section F.	<p>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.</p>

Investor-owned Utility and Third-party Load Management Solutions

As Liberty does not own the customer-side make-ready or EVSE under the EV Infrastructure Rule, Liberty cannot approve or disapprove any third-party load management or automated load management (ALM) solutions. Any customer-side ALM solutions must

be certified by a Nationally Recognized Testing Laboratory. However, Liberty will discuss load management techniques and ALM with all customers who take service under the EV Infrastructure Rule. As a customer-side solution, customers will bear the costs of any adopted ALM software or hardware.

Effective Date

Liberty requests that this Tier 2 advice letter be effective as of January 5, 2022.

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

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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 list.

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

Attachments

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

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

VIA EMAIL

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RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

- 3. **EV SERVICE EXTENSION.** The EV Service Extension shall consist of Electrical Distribution Infrastructure on the utility-side of the meter. Pursuant to Public Utilities Code Section 740.19(b), the term Electrical Distribution Infrastructure shall include poles, vaults, service drops, transformers, mounting pads, trenching, conduit, wire, cable, meters, conduit, substructure, protective structures, other equipment as necessary, and associated engineering and civil construction work including but not limited to excavation and repaving. (L)
- 4. **OWNERSHIP OF FACILITIES.** The EV Service Facilities installed under the provisions of this rule shall be owned, operated, and maintained by Utility if they are (a) located in the Right of Way, road or Franchise Area of Utility, (b) installed by Utility on Applicant's Premises for the purpose of the delivery of electric energy to EV Supply Equipment, or (c) installed by Applicant under the provisions of this rule, and conveyed to Utility.
- 5. **PRIVATE LINES.** Utility shall not be required to connect Service Facilities to or serve any Applicant from electric facilities that are not owned, operated, and maintained by Utility.
- 6. **SPECIAL OR ADDED FACILITIES.** Any special or added facilities Utility installs at the request of Applicant, will be installed at Applicant's expense in accordance with Rule 2, Description of Service.
- 7. **CONTRACTS.** Each Applicant requesting service may be required to execute a written contract(s) prior to Utility performing its work to establish service. Such contract(s) shall be in the form on file with the California Public Utilities Commission (Commission). (L)
- 8. **DISTRIBUTION LINE EXTENSIONS.** Whenever Utility's distribution system is not complete to the point designated by Utility where the Service Lateral is to be connected to Utility's distribution system, the extension of Distribution Line facilities will be installed in accordance with Rule 15, Distribution Line Extensions.
- 9. **RIGHTS-OF-WAY.** Rights-of-way or easements maybe required by Utility to install Service Facilities on Applicant's property to serve only Applicant.
 - a. **EV SERVICE EXTENSION.** If the EV Service Extension must cross property owned by a third party to serve Applicant, utility may, at its option, install such EV Service Extension after appropriate rights-of-way or easements, satisfactory to utility, are obtained without cost to utility.
 - b. **LINE EXTENSIONS.** If Utility's facilities installed on Applicant's property, or third-party property, will be or are designed to serve adjacent property, then Utility may, at its option, install its facilities under Rule 15, after appropriate rights-of-way or easements, satisfactory to Utility, are obtained without cost to Utility.
 - c. **CLEARANCES.** Any necessary rights-of-way or easements for Utility's facilities shall have provisions to maintain legal clearances from adjacent structures.

(continued)

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			Resolution No.	_____

RULE 24

ELECTRIC VEHICLE INFRASTRUCTURE

- 10. **ACCESS TO APPLICANT'S PREMISES.** Utility shall at all times have the right to enter and leave Applicant's Premises for any purpose connected with the furnishing of electric service (meter reading, inspection, testing, routine repairs, replacement, maintenance, emergency work, etc.) and the exercise of any and all rights secured to it by law, or under Utility's tariff schedules. These rights include, but are not limited to:
 - a. The use of a utility-approved locking device, if Applicant desires to prevent unauthorized access to Utility's facilities;
 - b. Safe and ready access for Utility personnel free from unrestrained animals;
 - c. Unobstructed ready access for Utility's vehicles and equipment to install, remove, repair, or maintain its facilities; and
 - d. Removal of any and all of its property installed on Applicant's Premises after the termination of service.
- 11. **SERVICE CONNECTIONS.** Only personnel duly authorized by Utility are allowed to connect or disconnect service conductors to or from Utility's Distribution Lines, remove meters, remove Utility-owned service facilities, or perform any work upon Utility-owned existing facilities.
- 12. **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.

(L)
|
(L)

B. INSTALLATION OF EV SERVICE EXTENSION

- 1. **METERING**
 - a. **METER ALL USAGE.** Utility will meter delivery of all electric power and energy, unless otherwise provided for by Utility's tariff schedules or by other applicable laws.
 - b. **METER LOCATION.** All utility meters and associated metering equipment shall be located at some protected location on Applicant's Premises as approved by Utility. The load served at each meter location shall consist of only EV load and incidental loads and will be clearly designated by the customer.
 - c. **NUMBER OF METERS.** The utility shall install a single meter per premise under this rule.
- 2. **GENERAL LOCATION.** The location of the EV Service Extension shall extend:
 - a. **FRANCHISE AREA.** From the point of connection at the Distribution Line to Applicant's nearest property line abutting upon any street, highway, road, or right-of-way, along which it already has, or will install distribution facilities; and

(continued)

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

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

(N)
|
(N)

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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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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California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R1812006 - CPUC - OIR TO CONTIN

FILER: CPUC

LIST NAME: LIST

LAST CHANGED: NOVEMBER 22, 2021

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FOR: ELECTRIFY AMERICA, LLC

MICHAEL CADE
BUCHALTER, A PROFESSIONAL CORPORATION
1331 NW LOVEJOY ST, STE. 900
PORTLAND, OR 97209

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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 #: 530-721-2435
 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) #: 182-E

Tier Designation: 2

Subject of AL: Modification to Rule 24.

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: No

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: 1/5/22

No. of tariff sheets: 12

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

Service affected and changes proposed¹: See attached advice letter

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: Sr. Manager, Rates and Regulatory Affairs
Utility Name: Liberty Utilities (CalPeco Electric) LLC
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 530-721-2435
Facsimile (xxx) xxx-xxxx:
Email: Dan.Marsh@libertyutilities.com

Name: AnnMarie Sanchez
Title: Coordinator
Utility Name: Liberty Utilities (California)
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 562-805-2082
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	