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April 13, 2023

**VIA EMAIL ONLY**

***EDTariffUnit@cpuc.ca.gov***

**Advice Letter 216-E  
(U 933-E)**

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

**Subject: Energy Savings Assistance Program Electrification Pilot**

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.”) 21-10-023, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 1 advice letter requesting approval to opt out of its Energy Savings Assistance (ESA) Program Electrification Pilot.

**Purpose**

Pursuant to Ordering Paragraph (“OP”) 43 of D.21-10-023, Liberty submits this Tier 1 advice letter requesting approval to opt out of its ESA Electrification Pilot.

**Background**

On November 7, 2019, D.19-11-005 reopened the Small and Multi-jurisdictional Utilities’ (SMJUs) applications for approval of low-income programs and budgets and provided guidance to the SMJUs regarding program design and implementation. The SMJUs were encouraged to review the large investor-owned utilities’ (IOUs) applications “to obtain and incorporate ideas and initiatives that may enhance programs and benefit eligible households in the SMJU service territory.”<sup>1</sup> Southern California Edison (SCE) proposed a “Building Electrification Pilot” in its application which was approved with modifications in D.21-06-015.<sup>2</sup> Liberty proposed its Electrification Pilot in its 2021-2026 budget application to be implemented in 2023. Liberty and SCE state in their applications the pilot programs support California’s Greenhouse Gas reduction goals.

On October 21, 2021, in D.21-10-023, the Commission approved Liberty’s Electrification Pilot pending approval of a Tier 2 advice letter to be submitted within six months of the filing of the evaluation of the San Joaquin Valley Disadvantaged Communities (SJV DAC) fuel switching pilots.<sup>3</sup> D.21-10-023 also provided an option to not run a fuel switching pilot by submitting a

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<sup>1</sup> D.19-11-005 at page 8.

<sup>2</sup> D.21-06-015 at page 386.

<sup>3</sup> D.21-10-023, OP 43 at page 172.

Tier 1 advice letter within six months of the filing of the evaluation of the SJV DAC fuel-switching pilot explaining Liberty's decision to opt out as informed by the evaluation report. On October 20, 2022, Evergreen Economics submitted its SJV DAC Pilot Projects Process Evaluation report.

### **Discussion**

Upon careful consideration, Liberty has decided not to move forward with the Energy Savings Assistance (ESA) Program's Electrification Pilot. Liberty has reviewed the SJV DAC pilot evaluation and concluded to opt out of the pilot. Liberty identified potential barriers and challenges that include budget concerns, the overall timeline of the pilot and assessing customer demand and participation. The determining factors in Liberty's decision to opt out and the management of unspent funds per Section 6.9.2. of D.21-10-023 are discussed below.

### **Budget**

Liberty's ESA contractor has projected that the total budget of \$168,752 for the program years (PYs) 2024 through 2026, may not be sufficient to support the pilot as designed. The ESA contractor estimates that they may be able to safely install at most two of the five pilot measures based on the total budget of \$14,000 per household. The SJV DAC pilot had an average investment of \$15,000 per home. The overall IOUs' pilot costs benefit from economies of scale compared to Liberty's small-scale pilot. Therefore, Liberty's average investment per home is not enough when considering challenges with out-of-area contractors and material costs for limited quantities.

Additional budget challenges identified by Liberty include the costs to upgrade electric panels. Costs to upgrade electric panels were significant and unanticipated according to the SJV DAC pilot evaluation.<sup>4</sup> While Liberty includes the panel upgrade as a potential measure offered under the proposed pilot, it was not anticipated by Liberty to be necessary for most homes. Furthermore, the SJV evaluation discusses transmission and distribution (T&D) upgrades being a potential cause of difficulty in navigating the Home Assessment process. Liberty does not have the resources to provide T&D upgrades beyond the electric panel. The costs to upgrade Liberty T&D infrastructure were not included in the scope of the approved budget for the pilot project.

### **Timeline**

Liberty also identifies concerns related to the timeline of the pilot for PYs 2024-2026. The SJV DAC pilot evaluation reports challenges with completing installations in the required amount of time due to delays for electrical upgrades.<sup>5</sup> The need for panel upgrades would also likely require additional time between purchasing and installation of equipment.<sup>6</sup> In addition, the process involved with panel upgrades can extend for multiple days.<sup>7</sup> The more extensive T&D work

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<sup>4</sup> SJV DAC Pilot Evaluation Report at page 22.

<sup>5</sup> SJV DAC Pilot Evaluation Report at pages 6-7.

<sup>6</sup> SJV DAC Pilot Evaluation Report at page 44.

<sup>7</sup> SJV DAC Pilot Evaluation Report at page 70.

required also impacted the timeline and was reported as uncertain and required coordinated consideration prior to implementing the pilot.<sup>8</sup> Liberty would therefore need to coordinate with its engineering department for feasibility and timelines with their already anticipated projects and impacted workload.

### **Demand and Participation**

Customer demand and participation is another potential barrier for Liberty to successfully implement the pilot. The recent extreme winter season experienced throughout Liberty's territory in program years 2022 into 2023 may have resulted in higher overall energy costs for many customers. With concerns of higher energy costs and potential outages, Liberty customers may be more reluctant to participate when considering the recent weather conditions. The SJV DAC pilot evaluation reports favorably with application completion for customer participation.<sup>9</sup> However, potential bill increases were the most significant barrier to participation and the majority of those not participating reported their concerns of higher bills post installation.<sup>10</sup> The SJV DAC pilot also incorporated Bill Protection Measures, whereas Liberty did not include any such offering in the pilot design that could address the barrier or hesitations around bill increases.

Liberty's climate zone compared to the climate zone(s) in the SJV pilot may result in a potentially larger barrier when it comes to customer participation as a winter peaking utility. The SJV DAC Pilot Evaluation report lists the 11 SJV DAC Pilot Communities.<sup>11</sup> Nine are in Climate Zone (CZ) 13 and the two exceptions are Le Grand (CZ 12) in the north and California City (CZ 14) in the south. All the SJV DAC pilot communities have different energy efficiency standards and energy budgets compared to Liberty (CZ 16), and all are in summer peaking zones.

Liberty evaluated the value of energy savings in CZ 13 compared to CZ 16 using the Time Dependent Valuation (TDV) methodology and statistics presented in the California Energy Commission's 2022 Reference Appendices for the 2022 Building Energy Efficiency Standards, Appendix JA 3.2, Table 3.1. The data shows for residential building types, a kBtu/kWh minimum of 13.89 and maximum of 2537.01 in CZ 13 compared to a minimum of 14.63 and maximum of 1286.61 in CZ 16. Liberty has concluded that the value of electricity savings is greatest during the hot, summer afternoons for CZ 13 and this value would not be realized in Liberty's much cooler mountain climate (CZ 16). Liberty's peak demand is winter evenings. This contrast in peak demand directly correlates with value of efficiency measures for heating and cooling in the different CZs. Fuel switching to electricity would likely increase costs for heating in CZ16, while the benefits from cooling would be negligible.

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<sup>8</sup> SJV DAC Pilot Evaluation Report at page 44.

<sup>9</sup> SJV DAC Pilot Evaluation Report at page 8.

<sup>10</sup> SJV DAC Pilot Evaluation Report at page 8.

<sup>11</sup> SJV DAC Pilot Evaluation Report at page 11.

**Unspent Funds**

Pursuant to Section 6.9.2., D.21-10-023, “any unspent and uncommitted funds from prior approved budgets”<sup>12</sup> are to be used to offset revenue collection for spending authorized in D.21-10-023. Liberty is removing the amount of \$168,752 from the authorized budget for PYs 2024-2026 as required by D.21-10-023. The authorized and revised budget schedules and portfolio savings goals are shown below:

Liberty's Approved Budgets, PYs 2021-2026						
2021	2022	2023	2024	2025	2026	Total
\$ 166,768	\$ 357,035	\$ 364,068	\$ 420,822	\$ 428,860	\$ 436,931	\$ 2,174,484

Liberty's Adjusted Budgets, PYs 2021-2026						
2021	2022	2023	2024	2025	2026	Total
\$ 166,768	\$ 357,035	\$ 364,068	\$ 364,571	\$ 372,609	\$ 380,680	\$ 2,005,732

Liberty's Approved Savings Goal, PYs 2022-2026						
	2022	2023	2024	2025	2026	Total
kWh	72,197	72,197	62,123	62,123	62,123	330,764
kW	17	17	17	17	17	86
Therms	-	-	999	999	999	2,997

Liberty's Adjusted Savings Goal, PYs 2022-2026						
	2022	2023	2024	2025	2026	Total
kWh	72,197	72,197	72,197	72,197	72,197	360,985
kW	17	17	17	17	17	86
Therms	-	-	-	-	-	-

**Conclusion**

Liberty requests to opt out of the ESA pilot for the reasons stated above. Liberty will continue to pursue potential resolutions or identify other electrification opportunities, as feasible, in future applications. D.21-10-023 states that minor program changes such as updating measures through the SMJU’s reports or advice letters allows the opportunity to include measures from the pilot to the ESA main program that may not be currently offered. Liberty plans on exploring options to better support electrification through additional measure offerings to Liberty’s ESA main program.

**Tier Designation**

Pursuant to General Order (“GO”) 96-B, and D.21-10-023, OP 43, this advice letter is submitted with a Tier 1 designation.

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<sup>12</sup> D.21-10-023 at page 138.

**Effective Date**

Liberty requests an effective date of May 13, 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 May 3, 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](mailto: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  
Email: [CaseAdmin@libertyutilities.com](mailto: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](mailto: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](mailto:ProcessOffice@cpuc.ca.gov).

If additional information is required, please do not hesitate to contact me at [Cindy.Fisher@libertyutilities.com](mailto:Cindy.Fisher@libertyutilities.com).

Energy Division Tariff Unit  
California Public Utilities Commission  
April 13, 2023  
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Respectfully submitted,

**LIBERTY**

*/s/ Cynthia Fisher*

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Cynthia Fisher  
Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List  
A.20-03-014 Service List

**VIA EMAIL**

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California  
Public Utilities  
Commission



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## CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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**PROCEEDING: A2003014 - WEST COAST GAS COMPA**  
**FILER: WEST COAST GAS COMPANY INC.**  
**LIST NAME: LIST**  
**LAST CHANGED: NOVEMBER 23, 2022**

[Download the Comma-delimited File](#)  
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

### Parties

---

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 BEHALF OF BEAR VALLEY ELECTRIC SERVICE  
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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 #: 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) #: 216-E

Tier Designation: 1

Subject of AL: Energy Savings Assistance Program Electrification Pilot

Keywords (choose from CPUC listing): LIEE / Low-Income Energy Efficiency

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-10-023

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: 5/13/23

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 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)

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## 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	