



Liberty Utilities (CalPeco Electric) LLC  
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June 14, 2024

**VIA EMAIL ONLY**

**EDTariffUnit@cpuc.ca.gov**

**Advice Letter 243-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: Income Graduated Fixed Charge Memorandum Account**

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.” 24-05-028, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 1 Advice Letter to establish the Income Graduated Fixed Charge (“IGFC”) Memorandum Account (“IGFCMA”).

**Purpose**

Pursuant to Ordering Paragraphs (“OP”) 1 and 9 of D. 24-05-028, Liberty submits this Tier 1 Advice Letter to establish the IGFCMA, which will track and record the incremental implementation and administration costs of income-graduated fixed charges. While OP 1 includes the implementation of an IGFC Balancing Account, Liberty is not requesting an IGFC Balancing Account at this time because, pursuant to OP 11 of D.24-50-028, Liberty will “record any over- or under-collection of revenues by income-graduated fixed charges as a separate line-item in its existing Base Revenue Requirement Balancing Account.”

**Background**

On June 30, 2022, Assembly Bill (AB) 205, Stats. 2022, Ch. 61 was signed into law. On July 14, 2022, the Commission issued an Order Instituting Rulemaking to establish demand flexibility policies and modify electric rates to advance the following objectives:

- a) enhance the reliability of California’s electric system;
- b) make electric bills more affordable and equitable;
- c) reduce the curtailment of renewable energy and greenhouse gas emissions associated with meeting the state’s future system load;
- d) enable widespread electrification of buildings and transportation to meet the state’s climate goals;
- e) reduce long term system costs through more efficient pricing of electricity; and;
- f) enable participation in demand flexibility by both bundled and unbundled customers.

**Proposed New Tariff**

**Preliminary Statement, Income Graduated Fixed Charge Memorandum Account (IGFCMA)**

Pursuant to D.24-05-028, issued May 9, 2024, the Income Graduated Fixed Charge Memorandum Account (IGFCMA) will record implementation costs and incremental administration costs of income-graduated fixed charges.

The disposition of any balance in this account will be addressed in a future Application.

**Tier Designation**

This advice letter is being submitted with a Tier 1 designation, per D.24-05-028.

**Effective Date**

Liberty requests an effective date of June 14, 2024.

**Protests**

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile, or by email, any of which must be received no later than July 4, 2024, 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).

Energy Division Tariff Unit  
California Public Utilities Commission  
June 14, 2024  
Page 3

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 [Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com).

Respectfully submitted,

**LIBERTY**

*/s/ Dan Marsh*

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Dan Marsh  
Senior Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List  
R.22-07-005 Service List

**VIA EMAIL**

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