



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

VIA EMAIL AND U.S MAIL

April 5, 2019

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

**Subject: Withdrawal of Liberty CalPeco (U 933 E) Advice Letter No. 103-E
Establishment of New Rule 24: Green Tariff and Rate Schedule GT –
Green Tariff Rate**

Dear Energy Division Tariff Unit:

In accordance with GO 96-B, Section 5.3, Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”) hereby withdraws Advice Letter 103-E, filed August 3, 2018. Liberty CalPeco has requested authority to establish a Green Tariff in A.18-12-001, its General Rate Case proceeding.

In accordance with GO 96-B, Section 5.3, and for the reasons stated above, this withdrawal letter is being submitted in the same manner it was served and to the same persons as Advice Letter 103-E.

Sincerely,

/s/ Daniel W. Marsh

Daniel W. Marsh
Manager, Rates and Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC

cc: Cherie Chan, CPUC Energy Division
Liberty Utilities General Order 96-B Advice Letter Service List

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

VIA EMAIL

gbinge@ktminc.com;
emello@sppc.com;
epoole@adplaw.com;
cem@newsdata.com;
rmccann@umich.edu;
sheila@wma.org;
abb@eslawfirm.com;
cbk@eslawfirm.com;
bhodgeusa@yahoo.com;
chilen@nvenergy.com;
phanschen@mofoc.com;
liddell@energyattorney.com;
cem@newsdata.com;
dietrichlaw2@earthlink.net;
ericj@eslawfirm.com;
clerk-recorder@sierracounty.ws;
plumascoco@gmail.com;
marshall@psln.com;
stephenhollabaugh@tdpud.org;
gross@portersimon.com;
mccluretahoe@yahoo.com;
catherine.mazzeo@swgas.com;
Theresa.Faegre@libertyutilities.com;
SDG&ETariffs@semprautilities.com;
greg.campbell@libertyutilities.com;
bcragg@goodinmacbride.com;

AdviceTariffManager@sce.com;
edtariffunit@cpuc.ca.gov;
jrw@cpuc.ca.gov;
rmp@cpuc.ca.gov;
jaime.gannon@cpuc.ca.gov;
mas@cpuc.ca.gov;
txb@cpuc.ca.gov;
efr@cpuc.ca.gov;
tlg@cpuc.ca.gov;
dao@cpuc.ca.gov;
ljt@cpuc.ca.gov;
mmg@cpuc.ca.gov;
kjl@cpuc.ca.gov;
denise.tyrrell@cpuc.ca.gov;
fadi.daye@cpuc.ca.gov;
winnie.ho@cpuc.ca.gov;
usrb@cpuc.ca.gov;
Rob.Oglesby@energy.ca.gov;
stevegreenwald@dwt.com;
vidhyaprabhakaran@dwt.com;
judypau@dwt.com;
dwtcpucdockets@dwt.com;
patrickferguson@dwt.com;
travis.ritchie@sierraclub.org;
dan.marsh@libertyutilities.com;
sharon.yang@libertyutilities.com;
ginge@kinectenergy.com

CALIFORNIA PUBLIC UTILITIES COMMISSION

**ADVICE LETTER FILING SUMMARY
ENERGY UTILITY**

MUST BE COMPLETED BY LSE (Attach additional pages as needed)

Company name/CPUC Utility No. **Liberty Utilities (CalPeco Electric) LLC (U 933-E)**

Utility type:

- ELC GAS
 PLC HEAT WATER

Contact Person: Daniel W. Marsh

Phone #: (562) 299-5104

E-mail: Dan.Marsh@libertyutilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
 PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 103-E

Tier Designation: 1 2 3

Subject of AL: Establishment of a New Rule 24: Green Tariff and Rate Schedule GT – Green Tariff Rate

Keywords (choose from CPUC listing):

AL filing type: Monthly Quarterly Annual One-Time Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution:

Does AL replace a withdrawn or rejected AL? No If so, identify the prior AL

Summarize differences between the AL and the prior withdrawn or rejected AL:

Resolution Required? Yes No

Requested effective date: September 1, 2018

No. of tariff sheets: 3

Estimated system annual revenue effect (%): ____

Estimated system average rate effect (%): ____

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: Residential, small commercial, and large commercial customers.

Service affected and changes proposed: N/A

Pending Advice Letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division Utility Info (including e-mail)

Attention: Tariff Unit
505 Van Ness Ave., 4th Floor
San Francisco, CA 94102
edtariffunit@cpuc.ca.gov

Liberty Utilities (CalPeco Electric) LLC
Attention: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Email: Dan.Marsh@libertyutilities.com



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

VIA EMAIL AND U.S. MAIL

August 3, 2018

**Advice Letter No. 103-E
(U 933-E)**

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

Subject: Establishment of New Rule 24: Green Tariff and Rate Schedule GT – Green Tariff Rate

I. Purpose

Liberty Utilities (CalPeco Electric) LLC (U 933 E) (“Liberty CalPeco”) hereby submits this Tier 2 Advice Letter No. 103-E establishing new Rule 24: Green Tariff and new rate schedule GT – Green Tariff Rate pursuant to the Commission’s approval of Advice Letter 94-E on June 29, 2018. The Green Tariff Rate is available for residential, A-1, A-2, and A-3 customers.

II. Background

Liberty CalPeco is committed to California’s goal of a cleaner energy future and has taken steps in this direction with the installation of the Luning Solar Facility and the in-construction Turquoise Solar Facility, which will increase Liberty CalPeco’s renewable generation to meet approximately 30% of its customers’ load. Liberty CalPeco is also actively exploring options for adding even more renewable capacity, with a goal of serving 100% of its customers’ load from renewable energy.

Many of the largest customers in Liberty CalPeco’s service territory are committed to meeting 100% of their electricity purchases with renewable generation as soon as possible. To help these customers reach their goal, Liberty CalPeco has established a new rate schedule GT – Green Tariff Rate, which will allow these customers and also residential and small commercial customers, to receive renewable energy from Liberty CalPeco’s Luning solar facility.

III. Rule 24: Green Tariff and Rate Schedule GT – Green Tariff Rate

Liberty CalPeco’s Green Tariff Rate is designed to allow interested customers an opportunity to purchase their power directly from Liberty CalPeco’s Luning Solar Facility, which is currently in base rates. The design of the Green Tariff Rate takes into account both the currently approved recovery of Luning in base rates and the cost of purchasing power to meet the customer load that is not met by Luning. The Green Tariff Rate consists only of the Luning

costs not recovered in base rates (including Green Tariff Rate customers). The Green Tariff Rate calculates the estimated cost of a kWh of energy generated by Luning using average 10-year costs and expected production. This value is then credited with the Luning kWh charge included in base rates and recovered from all customers, including Green Tariff Rate customers. The Green Tariff Rate is further credited with the Liberty CalPeco's cost to meet the California RPS obligation and cost of Liberty CalPeco purchasing conventional electricity to meet existing load that is not provided from the Luning Solar Facility. The rates collected from customers on the Green Tariff Rate will be credited to Liberty CalPeco's Energy Cost Adjustment Clause ("ECAC"), which will reduce electricity costs for existing customers not on the Green Tariff Rate.

Liberty CalPeco's Green Tariff Rate will be provided to all residential and commercial customers at the same rate of \$0.0166/kWh. Customers will be added to the Green Tariff Rate on a first-come, first-served basis, up to the limit of Luning's production, which is forecast at approximately 145 million kWh per year.

Tier Designation

Pursuant to General Order 96-B, Section 5, this advice letter is being submitted with a Tier 2 designation.

Effective Date

Liberty CalPeco requests that this Tier 2 Advice Letter become effective on September 1, 2018.

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 August 23, 2018, 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

Energy Division Tariff Unit
California Public Utilities Commission
August 3, 2018
Page 3

The protest should be sent via email and U.S. Mail (and by facsimile, if possible) to Liberty Utilities (CalPeco Electric) LLC 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 service lists.

If additional information is required, please do not hesitate to contact me.

Energy Division Tariff Unit
California Public Utilities Commission
August 3, 2018
Page 4

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/ Daniel W. Marsh

Daniel W. Marsh
Liberty Utilities (CalPeco Electric) LLC
Manager, Rates and Regulatory Affairs
Phone: 562-299-5104
Email: Dan.Marsh@libertyutilities.com

cc: Liberty CalPeco General Order 96-B Service List

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

VIA EMAIL

gbinge@ktminc.com;
emello@sppc.com;
epoole@adplaw.com;
cem@newsdata.com;
rmccann@umich.edu;
sheila@wma.org;
abb@eslawfirm.com;
cbk@eslawfirm.com;
bhodgeusa@yahoo.com;
chilen@nvenergy.com;
phanschen@mofo.com;
liddell@energyattorney.com;
cem@newsdata.com;
dietrichlaw2@earthlink.net;
ericj@eslawfirm.com;
clerk-recorder@sierracounty.ws;
plumascoco@gmail.com;
marshall@psln.com;
stephenhollabaugh@tdpud.org;
gross@portersimon.com;
mccluretahoe@yahoo.com;
catherine.mazzeo@swgas.com;
Theresa.Faegre@libertyutilities.com;
SDG&ETariffs@semprautilities.com;
greg.campbell@libertyutilities.com;
bcragg@goodinmacbride.com;

AdviceTariffManager@sce.com;
edtariffunit@cpuc.ca.gov;
jrw@cpuc.ca.gov;
rmp@cpuc.ca.gov;
jaime.gannon@cpuc.ca.gov;
mas@cpuc.ca.gov;
txb@cpuc.ca.gov;
efr@cpuc.ca.gov;
tlg@cpuc.ca.gov;
dao@cpuc.ca.gov;
ljt@cpuc.ca.gov;
mmg@cpuc.ca.gov;
kjl@cpuc.ca.gov;
denise.tyrrell@cpuc.ca.gov;
fadi.daye@cpuc.ca.gov;
winnie.ho@cpuc.ca.gov;
usrb@cpuc.ca.gov;
Rob.Oglesby@energy.ca.gov;
stevegreenwald@dwt.com;
vidhyaprabhakaran@dwt.com;
judypau@dwt.com;
dwtcpucdockets@dwt.com;
patrickferguson@dwt.com;
travis.ritchie@sierraclub.org;
dan.marsh@libertyutilities.com;
sharon.yang@libertyutilities.com;
ginge@kinectenergy.com

Attachment 1: Rule 24. Green Tariff

Attachment 2: Rate Schedule - GT

(N)
↑
↓

ELECTRIC RULE 24

GREEN TARIFF

A. PURPOSE: Liberty CalPeco is committed to California’s goal of a cleaner energy future and has taken steps in this direction with the installation of the Luning Solar Facility and the in-construction Turquoise Solar Facility, which will increase Liberty CalPeco’s renewable generation to meet approximately 30% of its customers’ load.

B. APPLICABILITY: The Green Tariff is available to all customers up to the limit of Luning’s production, which is forecast at approximately 145 million kWh per year.

C. GREEN TARIFF BACKGROUND

1. Liberty CalPeco’s Green Tariff is designed to allow interested customers an opportunity to purchase their power directly from Liberty CalPeco’s Luning Solar Facility, which is currently in base rates.
2. The design of the Green Tariff rate takes into account both the currently approved recovery of Luning in base rates and the cost of purchasing power to meet the customer load that is not met by Luning.
3. The intent is to include in the Green Rate only the Luning costs not recovered in base rates (including Green Tariff customers).

D. GREEN TARIFF ACCOUNTING

1. The Green Tariff initially calculates the estimated cost of a kWh of energy generated by Luning using average 10-year costs and expected production. This value is then credited with the Luning kWh charge included in base rates and recovered from all customers, including Green Tariff customers.
2. The Green Tariff rate is further credited with the Liberty CalPeco’s cost to meet the California RPS obligation and cost of Liberty CalPeco purchasing conventional electricity to meet existing load that is not provided from the Luning Solar Facility. The rates collected from customers on the Green Tariff will be credited to Liberty CalPeco’s Energy Cost Adjustment Clause (“ECAC”), which will reduce electricity costs for existing customers not on the Green Tariff.

(Continued)

Advice Letter No. 103-E

Issued by
Gregory S. Sorensen
Name

Date Filed August 3, 2018

Decision No. _____

President
Title

Effective September 1, 2018

Resolution No. _____

ELECTRIC RULE 24

GREEN TARIFF

(Continued)

E. GREEN TARIFF RATES

1. Under the Green Tariff, a customer pays the difference between their current generation charge and a charge that reflects the cost of Liberty CalPeco's goal of procuring 100% solar generation for their electricity needs.
2. Liberty CalPeco's Green Tariff is available to all residential and commercial customers at the rate shown on the Green Tariff Rate Schedule (Schedule No. GT).
3. Customers will be added to the Green Tariff on a first-come, first-served basis, up to the limit of Luning's production, which is forecast at approximately 145 million kWh per year.

(N)

Advice Letter No. 103-E

Issued by
Gregory S. Sorensen
Name

Date Filed August 3, 2018

Decision No. _____

President
Title

Effective September 1, 2018

Resolution No. _____

**Schedule No. GT
Green Tariff Rate**

APPLICABILITY

The Green Tariff Rate is available to residential, A-1, A-2, and A-3 customers. See Rule 24 Green Tariff for complete details.

TERRITORY

Entire California service area.

RATES

The customer shall pay the green tariff rate at a cost of \$0.0166 /kWh.

(N)

(N)

Advice Letter No. 103-E

Issued by
Gregory S. Sorensen
Name

Date Filed August 3, 2018

Decision No. _____

President
Title

Effective September 1, 2018

Resolution No. _____

Advice Letter No. 103-E

Decision No. _____

Issued by

Gregory S. Sorensen

Name

President

Title

Date Filed August 3, 2018

Effective September 1, 2018

Resolution No. _____