



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
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September 2, 2022

VIA EMAIL ONLY

EDTariffUnit@cpuc.ca.gov

**Advice Letter 195-E
(U 933-E)**

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

Subject: Submetering Protocol Implementation Memorandum Account

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.”) 22-08-024, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 1 Advice Letter to establish a Submetering Protocol Implementation Memorandum Account (“SPIMA”).

Purpose

Pursuant to Ordering Paragraph (“OP”) 2 of D.22-08-024, Liberty submits this Tier 1 advice letter to establish a memorandum account to track and record the incremental costs associated with implementing the submetering protocol, to be reviewed for reasonableness and cost recovery in Liberty’s next general rate case.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 February 3, 2020, a ruling requesting feedback on the draft TEF was issued. Liberty provided opening comments for the TEF staff proposal draft, Sections 7 and 8, which addressed submetering among other things, on July 14, 2020.

Issues before the Commission within the scope of the proceeding included policies to support submetering and billing for ZEVs.³ D.22-08-024 considered comments filed in 2020 and 2021, resolving issues regarding PEV Submetering Protocol, Electric Vehicle Service Equipment

¹ D.22-08-024 at p. 43.

² R.18-12-006.

³ The Assigned Commissioner’s Scoping Memo and Ruling, issued on May 2, 2019.

communication protocols, and implementation and timeline. The authorization to open memorandum accounts for tracking specific costs related to the implementation of submetering requirements was proposed and discussed in comments and approved in D.22-08-024.

Proposed New Tariff
Preliminary Statement Part 13.R, SPIMA

Pursuant to D.22-08-024, OP 2, Liberty will establish the SPIMA to track and record the incremental costs associated with implementing the Plug-in Electric Vehicle Submetering Protocol, to be reviewed for reasonableness and cost recovery in its next general rate case.

Tier Designation

Pursuant to General Order (“GO”) 96-B, and D.22-08-024, OP. 2, this advice letter is submitted with a Tier 1 designation.

Effective Date

Liberty requests an effective date of September 2, 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 September 22, 2022, 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
Email: CaseAdmin@libertyutilities.com

Notice

In accordance with General Order 96-B, Section 4.3, a copy of this Advice Letter is being sent

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California Public Utilities Commission
September 2, 2022
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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

gbinge@ktminc.com;
emello@sppc.com;
epoole@adplaw.com;
cem@newsdata.com;
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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) #: 195-E

Tier Designation: 1

Subject of AL: Establish Memorandum Account to Track and Record the Incremental Costs Associated with Implementing the Submetering Protocol in Accordance with Commission Decision 22-08-024

Keywords (choose from CPUC listing): Agreements, Contracts

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.22-08-024

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:

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: 9/2/22

No. of tariff sheets: 1

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: Preliminary Statement, 13. Memorandum Accounts

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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

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|---------------------------|--|--------------------------------|
| 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 | |