



Liberty Utilities (CalPeco Electric) LLC
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December 22, 2022

VIA EMAIL ONLY

EDTariffUnit@cpuc.ca.gov

**Advice Letter 209-E
(U 933-E)**

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

**Subject: Residential Uncollectible Balancing Account (RUBA) and Residential
Disconnection Protections Memorandum Account**

In accordance with California Public Utilities Commission (“Commission”) Decision (“D.”) 22-08-037, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the following Tier 2 Advice Letter to establish a two-way balancing account for recovery of residential uncollectible charges and memorandum account to track the administrative costs associated with implementing the requirements of this decision.

Purpose

Pursuant to Ordering Paragraph (“OP”) 11 and 12 of D.22-08-037, Liberty submits this Tier 2 advice letter to establish a two-way balancing account for recovery of residential uncollectible charges and to establish a memorandum account to track and record the administrative costs associated with implementing the residential disconnection protection requirements, to be reviewed for reasonableness and cost recovery in Liberty’s next general rate case.¹

Background

On August 25, 2022, the Commission approved D.22-08-037. OP 11 allows the establishment of a two-way balancing account for recovery of residential uncollectible charges. On October 26, 2022, Liberty applied for California Arrearage Payment Program funding.

OP 11 states:

Southwest Gas Company, Liberty Utilities LLC, Bear Valley Electric Service, a division of Golden State Water Company, PacifiCorp, Alpine Natural Gas Operating Company, and West Coast Gas Company, Inc. may each establish a two-way balancing account for

¹ D.22-08-037 at p. 38.

recovery of Residential uncollectible charges in rates through a Tier 2 Advice Letter. The advice letter must affirm the utility's intention to apply for available California Arrearage Payment Program funding.

OP 12 allows the establishment of a memorandum account to track the administrative costs associated with implementing this decision.

OP 12 states:

Southwest Gas Company, Liberty Utilities LLC, Bear Valley Electric Service, a division of Golden State Water Company, PacifiCorp, Alpine Natural Gas Operating Company, and West Coast Gas Company, Inc. may each establish a memorandum account to track the administrative costs associated with implementing the requirements of this decision through a Tier 2 Advice Letter.

Proposed New Tariffs

Preliminary Statement, Residential Uncollectible Balancing Account (RUBA)

Pursuant to D.22-08-037, OP 11, Liberty will establish the Residential Uncollectible Balancing Account (RUBA) to track and record the difference between authorized residential uncollectible revenues and the actual residential uncollectible expense.

Preliminary Statement Part 13.S, Residential Disconnection Protections Memorandum Account

Pursuant to D.22-08-037, OP 12, Liberty will establish the Residential Disconnection Protections Memorandum Account to track and record the incremental administrative costs associated with implementing the Phase 1-A Decision Establishing Residential Disconnection Protections for Small and Multi-Jurisdictional Utilities, 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.22-08-037, OP. 12, this advice letter is submitted with a Tier 2 designation.

Effective Date

Liberty requests an effective date of January 1, 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 January 11, 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:

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California Public Utilities Commission
December 22, 2022
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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 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

PRELIMINARY STATEMENT

(Continued)

13. MEMORANDUM ACCOUNTS (Continued).

T. Residential Uncollectible Balancing Account (RUBA)

(N)

Liberty Utilities (CalPeco Electric) LLC (“Liberty”) shall maintain the Residential Uncollectible Balancing Account.

1. Purpose

The purpose of the Residential Uncollectible Balancing Account is to record the difference between actual residential uncollectibles and authorized uncollectible expense due to the implementation of Decision 22-08-037.

2. Applicability

The Residential Uncollectible Balancing Account is applicable to D-1 schedules.

3. Accounting Procedures

Liberty shall maintain the Residential Uncollectible Balancing Account by making entries at the end of each month as follows:

- a. A debit/credit entry equal to the difference between the authorized bad debt expense and actual bad debt expense for the month.
- b. A credit entry shall be made to RUBA for any collections received related to prior bad debt write-offs.
- c. Liberty shall apply interest to the average net balance in the RUBA account at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month as reported in the Federal Reserve Statistical Release, H.15, or its successor publication. Accumulated interest will be included in the amount on which interest is accrued, but will be identified as a separate component of the RUBA account.

4. Effective Date

The Residential Uncollectible Balancing Account is effective January 1, 2023.

5. Account Disposition

The Residential Uncollectible Balancing Account is a two-way balancing account. Liberty in its next GRC application shall include a summary of the entries to the Residential Uncollectible Charges Balancing Account and a proposal for the disposition of any balance in the account.

(N)

Issued by

Advice Letter No. AL 209-E

Edward Jackson

Date Filed: December 22, 2022

Name

Decision No. D.22-08-037

President

Effective Date: January 1, 2023

Title

Resolution No. _____

VIA EMAIL

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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) #: 209-E

Tier Designation: 2

Subject of AL: Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account

Keywords (choose from CPUC listing): Balancing Account, Memorandum Account

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.22-08-037

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: 1/1/23

No. of tariff sheets: 2

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 Residential Disconnection Protections Memorandum Account, Preliminary Statement Residential Uncollectible Balancing Account (RUBA)

Service affected and changes proposed¹: N/A

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: 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

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	