



Liberty Utilities (CalPeco Electric) LLC
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Fax: 530-544-4811

November 27, 2023

VIA EMAIL ONLY
EDTariffUnit@cpuc.ca.gov

**Advice Letter No. 227-E-A
(U 933-E)**

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

Subject: Base Revenue Requirement Balancing Account

Liberty Utilities (CalPeco Electric) LLC (U 933 E) (“Liberty”) hereby submits this **Tier 2** Advice Letter (“AL”) requesting the authority to recover the balance in its Base Revenue Requirement Balancing Account (“BRRBA”) in accordance with Section 8 of the Preliminary Statement in Liberty’s tariff.¹

I. Purpose

This supplemental filing is being made to adjust the BRRBA balance to reflect an accurate balance as of September 30, 2022.

II. Coordination with Other Pending Rate Change

Liberty currently has several pending rate changes, some of which may also be approved for the January 1, 2024 effective date requested in this advice letter. In the event that multiple rate changes are approved this year, Liberty will make the necessary compliance submissions, including revised tariffs to implement the rate changes and effectuate the new rates requested in this advice letter and other proceedings as of January 1, 2024. If the other rate change approvals do not occur in time to effectuate the revised rates on January 1, 2024, Liberty will submit revised tariff sheets based on the rate changes requested in this advice letter to become effective on January 1, 2024, upon approval of this advice letter.

III. Background

In accordance with its tariffs, Liberty is authorized to maintain the BRRBA, which records the difference between Liberty’s authorized base rate revenue requirement and the recorded base rate revenue.

The disposition of the balance in the BRRBA is to be addressed in a Tier 2 advice letter only if the amount in the BRRBA as of September 30 is +/-5% of the authorized base rate revenue

¹ D.12-11-030 established Liberty’s BRRBA tariff.

requirement for preceding 12-month period. Liberty’s BRRBA balance as of September 30, 2023 is \$37.623 million, which is approximately 37% of the currently authorized base rate revenue requirement of \$101.167 million.

IV. Request

A. Recovery of the Balance in the BRRBA

The recorded BRRBA for the commercial customer class (A-1, A-2, A-3, and PA) was \$36.389 million as of September 30, 2023. The recorded BRRBA balance for the residential customer class (D-1, SL, and OL) was \$1.234 million as of September 30, 2023.

Liberty proposes to continue to use two BRRBA rates—one for the commercial customer class and one for the residential customer class—based on the above BRRBA balances and Liberty’s authorized sales forecast for the commercial customer class and the residential customer class.

Liberty requests recovery of the BRRBA as set forth in the table below. Liberty proposes a 12-month amortization period to recover the \$1.234 million under-collection for residential customers and a 36-month amortization period to recover the \$36.390 million under-collection for commercial customers, effective January 1, 2024.

| Calculation of BRRBA Rate by Customer Class Group | | | | |
|---|------------------|-----------------|--------------|----------|
| | Authorized Sales | Allocated BRRBA | Annual | Proposed |
| Residential (D-1) | 300,624,000 | \$1,229,752 | \$1,229,752 | 0.00409 |
| Outdoor Lights (OL) | 587,000 | 2,401 | \$2,401 | 0.00409 |
| Street Lights (SL) | 348,000 | 1,424 | \$1,424 | 0.00409 |
| Total Residential | 301,559,000 | \$1,233,577 | \$1,233,577 | 0.00409 |
| A-1 | 99,219,000 | \$12,706,483 | \$4,235,494 | 0.04269 |
| A-2 | 69,276,000 | 8,871,832 | \$2,957,277 | 0.04269 |
| A-3 | 114,913,000 | 14,716,335 | \$4,905,445 | 0.04269 |
| PA | 741,000 | 94,896 | \$31,632 | 0.04269 |
| Total Commercial | 284,149,000 | \$36,389,546 | \$12,129,849 | 0.04269 |
| Grand Total | 585,708,000 | 37,623,123 | \$13,363,426 | |

B. Rates

The proposed BRRBA rates will replace the currently authorized BRRBA rates. The table below provides a comparison of the current and proposed BRRBA rates by rate schedule.

Comparison of Authorized vs Proposed BRRBA Rates
 (per kWh)

| | Authorized | Proposed | Change |
|---------------------|------------|----------|-----------|
| Residential (D-1) | 0.01006 | 0.00409 | (0.00597) |
| Outdoor Lights (OL) | 0.01006 | 0.00409 | (0.00597) |
| Street Lights (SL) | 0.01006 | 0.00409 | (0.00597) |
| A-1 | 0.03772 | 0.04269 | 0.00497 |
| A-2 | 0.03772 | 0.04269 | 0.00497 |
| A-3 | 0.03772 | 0.04269 | 0.00497 |
| PA | 0.03772 | 0.04269 | 0.00497 |

The table below provides the bill impact by customer class.

| | Current Bill | Revised Bill | Change |
|--------------------|--------------|--------------|--------|
| Residential | \$185.40 | \$181.41 | -2.2% |
| Residential - CARE | 135.85 | \$132.30 | -2.6% |
| A-3 | 42,815.53 | \$43,715.37 | 2.1% |
| A-1 | 497.94 | \$505.67 | 1.6% |
| A-2 | 8,003.78 | \$8,113.46 | 1.4% |
| PA | 1,465.57 | \$1,496.54 | 2.1% |
| SL | 44.66 | 44.49 | -0.4% |
| OLS | 34.61 | 34.44 | -0.5% |

Effective Date

Liberty requests that this **Tier 2** advice letter be effective as of November 30, 2023.

Protests

Anyone wishing to protest this advice letter may do so by letter sent via U.S. mail, facsimile, or email, any of which must be received no later than November 20, 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:

Energy Division Tariff Unit
California Public Utilities Commission
November 27, 2023
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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 also be sent via email and U.S. mail 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
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 list.

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

Respectfully submitted,

LIBERTY

/s/ Dan Marsh

Dan Marsh
Senior Manager, Rates and Regulatory
Affairs

cc: Liberty 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;
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sharon.yang@libertyutilities.com;
ginge@regintluc.com



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: Dan Marsh
 Phone #: 530-721-2435
 E-mail: Dan.Marsh@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) #: 227-E-A

Tier Designation: 2

Subject of AL: 2023 BRRBA

Keywords (choose from CPUC listing): Increase Rates

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-11-030

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: 11/30/23

No. of tariff sheets: 0

Estimated system annual revenue effect (%): varies by rate class, see Advice Letter

Estimated system average rate effect (%): varies by rate class, see Advice Letter

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: BRRBA

Service affected and changes proposed¹: Adjust BRRBA rates based on 9/30/23 BRRBA balance.

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: Dan Marsh
Title: Senior Manager, Rates and Regulatory Affairs
Utility Name: Liberty Utilities (CalPeco Electric) LLC
Address: 9750 Washburn Road
City: Downey State: California
Telephone (xxx) xxx-xxxx: 530-721-2435
Facsimile (xxx) xxx-xxxx:
Email: Dan.Marsh@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:

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 | |