



Liberty Utilities (CalPeco Electric) LLC  
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November 1, 2024

**VIA EMAIL ONLY**

**EDTariffUnit@cpuc.ca.gov**

**Advice Letter No. 252-E  
(U 933-E)**

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

**Subject: Liberty Utilities (CalPeco Electric) LLC (U 933-E) – Quarterly Federal Grant Programs Participation Information**

**Purpose**

Pursuant to Ordering Paragraph (“OP”) 5 of California Public Utilities Commission (“Commission”) Resolution E-5254, Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty”) submits this informational **Tier 1** Advice Letter (“AL”).

**Background**

OP 5 of Resolution E-5254, the CPUC ordered:

Starting in Q3 of 2023 until all projects funded with Infrastructure Investment and Jobs Act (“IIJA”) grants are completed and implemented or Energy Division has notified the IOU that further reporting is no longer needed, Bear Valley Electric Service, Inc. (BVES), Liberty Utilities (CalPeco Electric) LLC (Liberty), Pacific Gas and Electric Company (PG&E), PacifiCorp d.b.a. Pacific Power (PacifiCorp), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and Southwest Gas Company (SWGAS) shall submit quarterly Tier 1 Information-Only advice letters containing, at a minimum, the information requested in Table 2 of this Resolution. Alpine Natural Gas and West Coast Gas Company should begin reporting in the quarter following approval of their Tier 2 Advice Letter in Ordering Paragraph 1.

**Information**

1. Status of applications submitted to DOE (under review, not awarded, awarded, etc.) including timeframe, the grant section number, and project name.

Liberty’s “Project Leapfrog: Foundational AMI and Grid Edge Computing Technology Deployment,” described in prior updates, was formally awarded to Liberty on October 1, 2024. Liberty is currently working towards completing the project’s first DOE milestone

known as the Project Management Plan (“PMP”).

2. Descriptions of projects proposed in grant applications, or anticipated use of funding, requested grant level (and commensurate ratepayer matching funds).

The project entails an upgrade to the company’s end-of-life electrical metering system that currently relies on obsolete electromechanical metering technology with a modern Advanced Metering Infrastructure (“AMI”) platform that would enable over-the-air meter reading and the establishment of a number of critical grid edge computing capabilities that would help the company streamline its operations, better detect potential wildfires, and optimize the integration of newer edge technologies.

By way of providing additional context, Liberty notes that Project Leapfrog’s scope is materially broader than the foundational AMI project that underwent the Commission’s review during Liberty’s last General Rate Case. All incremental scope components entail features and capabilities that the Company planned to implement in future phases of its AMI roadmap in the absence of DOE funding. They include:

- Integration of AMI with Liberty’s Outage Management System
- Deployment of software to enable the AMI mesh network to also support Distribution Automation (DA) and/or Online Sensor assets and deploying these assets at several locations in the key areas of the service territory.
- Utilization of edge computing capabilities inherent in AMI meters through the use of Distributed Intelligence (DI) apps such as high temperature or high impedance alarms, or load disaggregation.
- Phasing out or significantly reducing reliance on the increasingly obsolete MV-90 technology that measures consumption from larger customers.

The DOE grant provided an opportunity to implement these additional capabilities within a more condensed timeframe, and within a cost envelope that Liberty expects to have a rate impact comparable to that of the foundational capability alone. The project’s latest total cost estimate is \$39.9 million. The expected share of the DOE’s contribution to the project is \$13.1 million, while the Commission has previously approved a settlement amount of \$19.75 million for a much more narrowly scoped AMI project in 2022. The difference of approximately \$7 million between the sum of the DOE’s funding contribution and the previously approved AMI project budget is reflective of a larger project scope, higher installation cost estimates due to the Davis Bacon Act requirements that apply to all federally supported projects, and changes to the vendor’s technology pricing. Liberty expects to seek approval for the recovery of the currently unfunded portion of the project in a future proceeding.

3. Identify partners on the applications (other IOUs or POU, State agencies, Tribes, etc.).

Liberty has consulted with multiple local stakeholders, including South Tahoe Public Utility District, City of South Lake Tahoe, City of Loyalton, Barton Memorial Hospital, Tahoe Prosperity Center, Advance, Town of Truckee, El Dorado County, Placer County, Alpine County Supervisor, Alpine County Admin. Office, Sierra County, Washoe Tribe, Lake Tahoe USD, Tahoe Chamber, Tahoe Regional Planning Association, Lukins Water, and Vail Ski Corp. Partnership opportunities have been discussed with all parties and will commence in the event of the grant being awarded.

4. Assessment of future award opportunities including match requirements and the expected source(s) for any match funding.

Liberty is currently concentrating its efforts on getting the current project off to a successful start and is not currently planning on submitting any more federal government grant applications.

### **Effective Date**

Liberty requests that this **Tier 1** advice letter be effective as of November 1, 2024.

### **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 21, 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, 4<sup>th</sup> Floor  
San Francisco, CA 94102-3298  
Facsimile: (415) 703-2200  
Email: [edtariffunit@cpuc.ca.gov](mailto: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](mailto:CaseAdmin@libertyutilities.com)

Energy Division Tariff Unit  
California Public Utilities Commission  
November 1, 2024  
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**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/ Elly O'Doherty  
Elly O'Doherty  
Manager, Rates and Regulatory Affairs

cc: Liberty General Order 96-B Service List

Field Number	Bin	Field Name	Liberty-001
1	Data Management	Index Number	Liberty-001
2	Data Management	Entry Added	Q3-2023
3	Data Management	Entry Updated	Q4-2023
4	Data Management	Federal Recipient Identifier Number	N/A
5	Identifying	Utility Name	Liberty Utilities (CalPeco Electric) LLC
6	Identifying	Non-Utility Project Partners	The following parties have provided letters of support for the project and will be approached to explore further partnership opportunities in the event of a successful conclusion of the ongoing DOE Award Negotiations: South Tahoe Public Utility District, City of South Lake Tahoe, City of Loyalton, Barton Memorial Hospital, Tahoe Prosperity Center, Advance, Town of Truckee, El Dorado County, Placer County, Alpine County Supervisor, Alpine County Admin. Office, Sierra County, Washoe Tribe, Lake Tahoe Unified School District, Tahoe Chamber, Tahoe Regional Planning Association, Lukins Water and Vail Ski Corp.
7	Identifying	Project Name	Project Leapfrog
8	Identifying	Description of Project	Upgrade to the company's end-of-life electrical metering system that currently relies on obsolete electromechanical metering technology with a modern Advanced Metering Infrastructure (AMI) platform that would enable over-the-air meter reading and the establishment of a number of critical grid edge computing capabilities that would help the company streamline its operations, better detect potential wildfires, and optimize the integration of newer edge technologies.
9	Identifying	State/CPUC Goal Support	Advanced Metering Infrastructure
10	Identifying	Cost Recovery Proceedings	2022 GRC D.23-04-043
11	Identifying	Related Proceedings	N/A
12	Identifying	Link	N/A
13	Identifying	Point of Contact	Dan Marsh, Dan.Marsh@Libertyutilities.com
14	Grant Info	Funding Vehicle	IJA
15	Grant Info	Funding Agency	DOE
16	Grant Info	Funding Section Number	Sec. 40107
17	Grant Info	Program/Grant Name	Smart Grid Grants
18	Grant Info	Direct or Agency	Direct
19	Grant Info	State Agency Awarding	N/A
20	Grant Info	Competitive/Formula	Competitive
21	Grant Info	Award Type	Grant
22	Grant Info	Award Status	Award issued.
23	Grant Info	Award Date	October 1, 2024.
24	Grant Info	Narrative of costs incurred	Costs incurred to date entail internal labor and external consulting expenditures required to prepare the application, secure the award, and prepare the project management plan deliverable.
25	Grant Info	Future Opportunities	Will be evaluated across available programs upon conclusion of the DOE Negotiations process for Project Leapfrog.
26	Grant Info	Total National Funding Available for Program	3,000,000,000
27	Grant Info	Related Awards	None
28	Financial	Initial Estimated Project Total Budget	26,200,000
29	Financial	Updated Estimated Project Total Budget	39,928,428
30	Financial	Award Amount Applied For	13,071,300
31	Financial	Award Amount Awarded	13,071,300
32	Financial	Actual Funding to Date	N/A
33	Financial	Funding Spent	N/A
34	Financial	Funding Remaining	N/A
35	Financial	Match Required	Yes
36	Financial	Ratepayer Match	Yes
37	Financial	Ratepayer Match Amount Requested	26,857,128
38	Financial	Ratepayer Match Amount Approved	19,751,248
39	Financial	Ratepayer Match Approval	N/A
40	Financial	Other Match Amount	None expected.
41	Financial	Other Match - State Source	N/A
42	Financial	Other Match - Source Name	N/A
43	Financial	Other Match Status	N/A
44	Financial	Other Match Date	N/A
45	Financial	Funding Expiration Date	N/A
46	Status	Active/Inactive	Active
47	Status	Status	Project Awarded
48	Status	Initial Estimated Start Date	2024
49	Status	Updated Estimated Start Date	2024
50	Status	Initial Estimated Completion Date	2028
51	Status	Updated Estimated Completion Date	N/A
52	Status	Actual Completion Date	N/A
53	Status	Milestones	N/A

Field Number	Bin	Field Name	Liberty-001
54	Status	Challenges	Incremental cost requirements driven by various DOE funding compliance conditions, including the Davis-Bacon Act, which will have material bearing on the meter installation costs.
55	Location	Counties	All counties served by Liberty (Alpine, El Dorado, Mono, Nevada, Placer, Plumas, Sierra).
56	Location	Census Tracts or Shape	All census tracts served by Liberty
57	Location	Disadvantaged or Vulnerable Community Location	Yes
58	Location	Disadvantage or Vulnerable Community Definition	Based on the US Government's Climate and Economic Justice Screening Tool ("CEJST") tool. Must meet both Energy Burden and Low Income Threshold.
59	Location	Tribal Location	Partial
60	Location	Tribal Benefit	Partial
61	Location	Tribal Name	Washoe Tribe
62	Project Elements	Renewable Generation	No
63	Project Elements	Renewable Generation Capacity	N/A
64	Project Elements	Renewable Generation Unit	N/A
65	Project Elements	Renewable Location	N/A
66	Project Elements	Microgrid	No
67	Project Elements	Storage	No
68	Project Elements	Storage Capacity	N/A
69	Project Elements	Storage Unit	N/A
70	Project Elements	Storage Location	N/A
71	Project Elements	Distribution	Yes
72	Project Elements	Transmission	No
73	Project Elements	Energy Efficiency	No
74	Project Elements	Electric Vehicle Charging	**Other
75	Project Elements	Electric Vehicle Chargers	N/A
76	Project Elements	Biofuels/Hydrogen	No
77	Project Elements	IT/Remote Operation/Monitoring	Yes
78	Project Elements	Hydropower	No
79	Project Elements	Hydropower Generation Capacity	N/A
80	Project Elements	Hydropower Generation Unit	N/A
81	Project Elements	Carbon Capture and Storage	No

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

**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: Elly D'Oherty

Phone #: 530-807-8987

E-mail: Elly.Doherty@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) #: 252-E

Tier Designation: 1

Subject of AL: Infrastructure Investment and Jobs Act (IIJA) Q3 Update

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-5254

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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: 11/1/24

No. of tariff sheets: 0

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Elly D'Oherty  
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: 530-807-8987  
Facsimile (xxx) xxx-xxxx:  
Email: [Elly.Doherty@libertyutilities.com](mailto:Elly.Doherty@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](mailto: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	