



Liberty Utilities (CalPeco Electric) LLC
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May 25, 2018

VIA EMAIL AND FEDERAL EXPRESS

**Advice Letter No. 92-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:	<u>Supplement to Advice Letter 92-E, Establishment of the Solar on Multifamily Affordable Housing Program Balancing Account Pursuant to Decision 17-12-022</u>
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I. PURPOSE

The purpose of this supplemental advice filing is to provide data requested by the Energy Division in a memo dated April 18, 2018. Please see Attachment A for Liberty Utilities (CalPeco Electric) LLC's ("Liberty CalPeco") responses to Energy Division's questions.

II. TIER DESIGNATION

Pursuant to General Order ("GO") 96-B, this advice letter is submitted with a Tier 1 designation, which is the same tier designation as the original filing, AL-92-E.

III. EFFECTIVE DATE

This supplemental advice filing will become effective on the same day as the original AL-92-E filing, which is March 19, 2018.

IV. PROTESTS

Liberty CalPeco asks that the Commission, pursuant to GO 96-B, maintain the original protest and comment period designated in AL-92-E and not reopen the protest period. The modifications included within this supplemental advice filing do not make substantive changes that would affect the overall evaluation of the filing.

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V. 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 UTILITIES (CALPECO ELECTRIC) LLC

/s/ Daniel W. Marsh

Daniel W. Marsh
Liberty Utilities (CalPeco Electric) LLC
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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

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ATTACHMENT A

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 19, 2018

TO: Dan Marsh

FROM: Energy Division

RE: Notification of Need for Supplemental Information for Liberty Utilities Advice Letter 92-E - Establishment of the Solar on Multifamily Affordable Housing Program Balancing Account Pursuant to Decision 17-12-022.

This memo is intended to communicate the need for additional information to be provided in a supplemental advice letter to Energy Division by May 8th, 2018.

- 1) Please provide a table outlining the 2016, 2017, and 2018 Greenhouse Gas Revenue Balancing Account amounts available to the Solar on Multifamily Affordable Housing (SOMAH) Balancing Account.

If the SOMAH/AB 693 program funding calculation methodology differs by year, please cite the calculation used to derive the reported amount.

See table 1 below for a template:

Table 1

Year	Account Balance of Solar on Multifamily Affordable Housing (SOMAH) Balancing Account	Calculation Methodology
2016	\$147,156	5% of recorded GHG allowance proceeds (D.18-03-024)
2017	\$287,032	10% of forecast GHG allowance proceeds (D.18-03-024)
2018	\$349,673	10% of forecast GHG allowance proceeds (D.18-03-024)
Total	\$783,861	

- 2) Please provide a list of cost categories Liberty Utilities expects to track under the umbrella of “administrative costs” as authorized by D.17-12-022 Page 37, FOF 26, and OP 2. Please provide a brief narrative explaining these cost categories.

Response: As stated in AL-92-E, Liberty CalPeco expects to incur and track administrative costs in a single category that would encompass reporting, processing of invoices and payments, and related data

requests. According to statute (Section 2879 (e)), no more than 10% of the funds allocated to the program shall be used for administration.

- 3) For each cost category identified above and using the Energy Division provided list of Low Income Housing Tax Credit properties (and their respective number of units) served by Liberty Utilities, please provide a table for both the to-date *and* projected administration costs under low, mid, and high program participation scenarios. See table 2 and 3 below for templates:

Response: Liberty CalPeco has not developed detailed administrative costs, but statute requires administrative costs to be no more than 10%, which would total \$78,386. Liberty CalPeco expects its administrative costs to be significant less than 10%, since the program will be administered by an outside party.

Table 2

Administrative Cost Category	To-Date Costs (\$)
Administrative Costs	\$0

Table 3

Administrative Cost Category	Projected Administration Costs (\$) if 25% of eligible properties participate (Low)	Projected Administration Costs (\$) if 50% of eligible properties participate (Mid)	Projected Administration Costs (\$) if 75% of eligible properties participate (High)
Administrative Costs	\$19,596	\$39,193	\$58,790

Sincerely,

Tory Francisco
 Energy Division
 California Public Utilities Commission

CC: Sara Kamins
 ED Tariff Unit