

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY LSE (Attach additional pages as needed)

Company name/CPUC Utility No. **Liberty Utilities (CalPeco Electric) LLC (U 933-E)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person for questions and approval letters: Ken Wittman

Phone #: 530-543-5267

E-mail: ken.wittman@libertyutilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **48-E**

Subject of AL: **Fire Hazard Prevention Memorandum Account Rulemaking 15-05-006 Update**

Tier Designation: 1 2 3

Keywords (choose from CPUC listing):

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution

R. 15-05-006

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL¹: Proceeding No. Update

Resolution Required? Yes No

Requested effective date: August 24, 2015

No. of tariff sheets: 1

Estimated system annual revenue effect: (%): 0

Estimated system average rate effect (%): 0

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: Fire Hazard Prevention Memorandum Account (FHPMA)

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: n/a

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
edtariffunit@cpuc.ca.gov

Utility Info (including e-mail)
Liberty Utilities (CalPeco Electric) LLC
Attention: Advice Letter Protests
933 Eloise Avenue
South Lake Tahoe, CA 96150
Email: ken.wittman@libertyutilities.com

¹ Discuss in AL if more space is needed.



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

VIA EMAIL AND HAND-DELIVERY

August 24, 2015

**Advice Letter 48-E
(U 933-E)**

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

Subject: Fire Hazard Prevention Memorandum Account Rulemaking 15-05-006 Update

Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty Utilities”) hereby submits this **Tier 1** Advice Letter to update its Fire Hazard Prevention Memorandum Account (“FHPMA”) tariff so that the new Rulemaking (R.) 15-05-006 is properly referenced. The revised tariff sheets are enclosed as Attachment 1.

Background

In compliance with Decision 09-08-029, Liberty Utilities opened the FHPMA in order to record the costs incurred related to fire hazard prevention. The FHPMA tariff currently references only R.08-11-005, the proceeding initiated to consider and adopt Commission regulations to reduce fire hazards associated with overhead power line facilities and aerial communication facilities in close proximity to power lines.

R.15-05-006 is the successor to R.08-11-005. The Commission has noted that in rulemaking proceedings that span long periods of time, it is the Commission’s practice to periodically close the rulemaking proceeding and open a successor rulemaking proceeding with some or all of the outstanding matters transferred to the new proceeding.

In light of the successor rulemaking, Liberty Utilities files this **Tier 1** Advice Letter which updates the FHPMA tariff to incorporate references to R.15-05-006 in addition to R.08-11-005.

Effective Date

Liberty Utilities requests that this **Tier 1** advice letter be effective as of August 24, 2015.

Protests

Anyone wishing to protest this filing 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 14, 2015, which is 20 days after

Energy Division Tariff Unit
California Public Utilities Commission
August 24, 2015
Page 2

the date of this filing. The protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. There is no restriction on who may file a protest. 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 also should be sent via email and U.S. Mail (and by facsimile, if possible) to Liberty Utilities at the addresses show 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
Fax: 530-544-4811
Email: ken.wittman@libertyutilities.com

With a copy to:
Steven F. Greenwald
Vidhya Prabhakaran
Davis Wright Tremaine LLP
505 Montgomery Street, Suite 800
San Francisco, CA 94111
Fax: 415-276-6599
Email: stevegreenwald@dwt.com
Email: vidhyaprabhakaran@dwt.com

Notice

In accordance with General Order 96-B, Section 4.3, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list.

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

Sincerely,



Ken Wittman
Senior Manager of Finance, Accounting and Regulatory - California
Liberty Utilities (CalPeco Electric) LLC

Attachments

cc: Liberty Utilities General Order 96 –B Advice Letter 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
cem@newsdata.com
rmccann@umich.edu
sheila@wma.org
abb@eslawfirm.com
cbk@eslawfirm.com
bhodgeusa@yahoo.com
chilen@nvenergy.com
phanschen@mofa.com
liddell@energyattorney.com
cem@newsdata.com
dietrichlaw2@earthlink.net
abb@eslawfirm.com
glw@eslawfirm.com
clerk-recorder@sierracounty.ws
plumascoco@gmail.com
marshall@psln.com
stephenhollabaugh@tdpud.org
gross@portersimon.com
mccluretahoe@yahoo.com
catherine.mazzeo@swgas.com
Theresa.Faegre@libertyutilities.com
Ken.Wittman@libertyutilities.com
SDG&ETariffs@semprautilities.com
Alain.Blunier@libertyutilities.com

AdviceTariffManager@sce.com
edtariffunit@cpuc.ca.gov
dlf@cpuc.ca.gov
jrw@cpuc.ca.gov
xjv@cpuc.ca.gov
rmp@cpuc.ca.gov
jaime.gannon@cpuc.ca.gov
mas@cpuc.ca.gov
jm3@cpuc.ca.gov
Jeannie.chang@cpuc.ca.gov
txb@cpuc.ca.gov
efr@cpuc.ca.gov
joc@cpuc.ca.gov
tlg@cpuc.ca.gov
dao@cpuc.ca.gov
ljt@cpuc.ca.gov
dlf@cpuc.ca.gov
mmg@cpuc.ca.gov
md2@cpuc.ca.gov
kjl@cpuc.ca.gov
denise.tyrrell@cpuc.ca.gov
fadi.daye@cpuc.ca.gov
winnie.ho@cpuc.ca.gov
usrb@cpuc.ca.gov
Rob.Oglesby@energy.ca.gov
stevegreenwald@dwt.com
vidhyaprabakaran@dwt.com
judypau@dwt.com
jeffreygray@dwt.com
dwtcpucdockets@dwt.com
patrickferguson@dwt.com
travis.ritchie@sierraclub.org

Attachment A
Revised Tariff Sheets

PRELIMINARY STATEMENT
(Continued)

13. MEMORANDUM ACCOUNTS (Continued)

B. FIRE HAZARD PREVENTION MEMORANDUM ACCOUNT (FHPMA)

i. PURPOSE

The purpose of the Fire Hazard Prevention Memorandum Account (FHPMA) is to record the costs incurred related to fire hazard prevention in compliance with Commission Decision No. (D.)09-08-029. These costs may include the following expenses:

- (1) Vegetation management activities to reduce risk of fires;
- (2) Cost of vegetation maintenance program, inspection, and patrolling requirements;
- (3) Costs associated with designing, construction, and maintaining facilities to mitigate fire hazards in high speed wind areas; and
- (4) Other costs as required in order to implement D.09-08-029.

ii. PROCEDURE

In Compliance with G.O. 95 and 165. the Utility will:

- (1) Record entries to the FHPMA at the end of the month representing the total costs associated with complying with the measures described above. These costs will be limited to those not previously authorized in a general rate case or any other regulatory proceeding.
- (2) Maintain support for each amount recorded in this FHPMA
- (3) Accrue interest monthly to this memorandum account applying one-twelfth of the interest rate to the average of the beginning and ending balance in the FHPMA. The interest rate shall be the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release H.15, or its successor.

iii. APPLICABILITY

The FHPMA shall apply to all customer classes, except for those specifically excluded by the Commission in Rulemaking 08-11-005, 15-05-006, or successor proceedings.

iv. CHANGES IN RATES

Liberty Utilities will request recovery of the FHPMA balance as determined by the Commission in Rulemaking 08-11-005, 15-05-006, or successor proceedings.

(T)

(T)

Advice Letter No. 48-E

Issued by
Gregory S. Sorensen
Name

Date Filed August 24, 2015

Decision No. _____

President
Title

Effective August 24, 2015

Resolution No. _____

PRELIMINARY STATEMENT
(Continued)

13. MEMORANDUM ACCOUNTS (Continued)

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- (2) Maintain support for each amount recorded in this FHPMA
- (3) Accrue interest monthly to this memorandum account applying one-twelfth of the interest rate to the average of the beginning and ending balance in the FHPMA. The interest rate shall be the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release H.15, or its successor.

iii. APPLICABILITY

The FHPMA shall apply to all customer classes, except for those specifically excluded by the Commission in ~~future phases on~~ Rulemaking 08-11-005, 15-05-006, or successor proceedings.

(T)

iv. CHANGES IN RATES

Liberty Utilities will request recovery of the FHPMA balance as determined by the Commission in Phase 2 of Rulemaking 08-11-005, 15-05-006, or successor proceedings.

(T)