



Liberty Utilities (CalPeco Electric) LLC
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March 27, 2020

VIA E-MAIL ONLY

leslie.palmer@cpuc.ca.gov

Lee Palmer, Director
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Business Continuity and COVID-19 (Novel Coronavirus) Response Plans

Dear Mr. Palmer:

Liberty Utilities (CalPeco Electric) Corp. ("Liberty CalPeco") submits this response to Commission Executive Director Alice Stebbins' March 20, 2020 letter addressing company policies for responding to and continuing operations during the COVID-19 pandemic. Liberty CalPeco filed Advice Letter No. 139-E on March 24, 2020, notifying the Commission of the implementation of emergency customer protections for customers affected by the COVID-19 state of emergency. The advice letter described measures implemented by Liberty CalPeco designed to protect the health and safety of employees, customers, and communities. Liberty CalPeco remains committed to the delivery of safe and reliable electric service to our customers during this state of emergency.

Below are Liberty CalPeco's responses to the questions contained in the March 20, 2020 letter.

Item No. 1:

How is the Company providing safer work environments for its employees?

Response to Item No. 1:

Liberty CalPeco has implemented the following protective measures to safeguard the health and safety of employees:

- Liberty CalPeco has a pandemic preparedness plan and a task force that is working with guidance from the Centers for Disease Control and Prevention ("CDC"). This task force has spent several weeks preparing for how the virus might impact the organization and communities served and how to respond appropriately.
- Liberty CalPeco continues to monitor the situation and actively share updates and information with employees (weekly or more often as needed) so they can keep themselves, their families, and their community safe.

- Liberty CalPeco has deployed social distancing policies, identified key staff, and separated them. Liberty CalPeco has instituted a remote workplace separation program for those business functions for which this is practicable.
- Liberty CalPeco has implemented deep cleaning in its offices by using third-party disinfection services.
- Liberty CalPeco has provided customer service representatives and field personnel with gloves and additional protective supplies and requires social distancing of at least six feet for interactions with customers.
- Liberty CalPeco has limited employee travel, suspended in-person meetings, and postponed larger gatherings and events.
- Liberty CalPeco requires employees to follow the CDC recommendations on personal safety, such as frequent hand washing and distancing from others.
- Liberty CalPeco requires employees who feel sick or have concerns regarding potential exposure to stay at home.

Item No. 2:

How will the Company continue all business and service delivery operations in the event of further community transmission?

Response to Item No. 2:

Liberty CalPeco has implemented social distancing policies. Key staff have been identified and separated. In addition, Liberty CalPeco has instituted a remote workplace separation program for those business functions for which this is practicable.

Item No. 3:

Which essential functions can and cannot be performed remotely or transferred between locations?

Response to Item No. 3:

All essential functions can be performed remotely except for the following:

- Electric Line Operations (emergency response, new business, maintenance, repair)
- Electric Outage Management (crew dispatch, damage assessment)
- Supply Chain Management (warehouse, fleet and fleet repair)
- Customer/Field Service (meter reading, service orders)
- Capital Asset Management (construction activities, inspections)
- Customer Call Center/Customer Service Office (because of the specialized equipment and technology used, customer service representatives continue to work in the office)

Item No. 4:

What is your company's response when employees are unable to work at their assigned job sites?

Response to Item No. 4:

All employees, except those listed above, have been accommodated to work remotely.

Item No. 5:

How is your company responding to shelter in place orders, including for employees whose homes or job sites are in locations where such orders are in effect?

Response to Item No. 5:

California has a stay at home order in effect. Please see the response to items 2 and 3 for a description of the actions taken to accommodate employees.

Item No. 6:

Does continuity planning differ for pandemics versus events such as earthquakes or wildfires?

Response to Item No. 6:

Yes. Pandemic preparedness does not assume the disruption or degradation of electric service. Plans for events such as earthquakes or wildfires must consider the disruption or degradation of electric service.

Item No. 7:

Whether your company has already activated your business continuity plan in response to COVID-19?

Response to Item No. 7:

Yes. Liberty CalPeco has activated its business continuity plan in response to COVID-19.

Item No. 8:

Provide any communications distributed to your employees or customers about potential impacts to operations and service that may occur as a result of your company's COVID-19 response?

Response to Item No. 8:

Please see the attached employee, customer and customer service office communications.

Item No. 9:

Has your company implemented the CDC's interim guidance?

Response to Item No. 9:

Yes. The Company's task force is working with guidance from the CDC. Employees are required to follow the CDC's recommendation on personal safety, such as frequent hand washing and distancing from others.

Item No. 10:

What effects might the spread of COVID-19 have on your call center?

Response to Item No. 10:

The Company does not anticipate that the spread of COVID-19 would have any significant impact on our call center. If employees are impacted by COVID-19 and unable to keep up with call volume, customer response time will suffer.

Item No. 11:

What effects might the spread of COVID-19 have on your credit and collections processes?

Response to Item No. 11:

Liberty CalPeco could experience delays in our credit and collections processes if employees responsible for this function are impacted by COVID-19.

Item No. 12:

Have you taken any actions or are you planning any actions for customers impacted by COVID-19, such as suspending disconnections or implementing bill payment plans?

Response to Item No. 12:

Yes. Liberty CalPeco has implemented the following actions for customers impacted by COVID-19:

- Liberty CalPeco has implemented payment plan options for residential customers.
- Liberty CalPeco has suspended disconnection for non-payment and associated fees.
- Liberty CalPeco has waived deposit and late fee requirements.
- Liberty CalPeco has suspended all CARE and FERA programs removals.
- Liberty CalPeco has discontinued generating all recertification and verification requests that require customers to provide their current income information.
- Liberty CalPeco has encouraged customers who have questions or who may be facing potential hardship to contact customer service. Liberty CalPeco staff is trained and ready to inform and support customers who may experience financial difficulty because of

COVID-19. Liberty CalPeco offers a variety of payment options and can assist customers with payment arrangements if needed. Customers are encouraged to utilize the payment methods available on Liberty CalPeco's website and to call with questions at (800) 782-2506.

Item No. 13:

How will you communicate to the public about COVID-19 and your operations?

Response to Item No. 13:

Liberty CalPeco has implemented the following methods of outreach regarding the customer protections described above:

- Liberty CalPeco has begun notifying customers by website, social media, and direct mail.
- Liberty CalPeco has started notifying local government and/or elected officials by email that the aforementioned customer protections are in effect.
- Liberty CalPeco has a 24-hour emergency hotline equipped to answer calls from customers seven days a week, 365 days a year.
- Liberty CalPeco has added a page on its website dedicated to COVID-19-related updates. Updates will also be shared via email and social media.

If you have any questions regarding this response, please contact me.

Sincerely,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/ Edward N. Jackson

EDWARD N. JACKSON

Director, Rates and Regulatory Affairs

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Liberty Utilities (CalPeco Electric) LLC

March 27, 2020

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Commissioner Martha Guzman Aceves, CPUC, *martha.guzman-aceves@cpuc.ca.gov*

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hazel.miranda@cpuc.ca.gov

Response to Item No. 8
Employee Messages

With the recent news of cases of the 2019-novel coronavirus (2019-nCoV) being discovered in North America, we wanted to provide employees with information on the virus as well as some general illness prevention and safety tips.

As of January 28, 2020, the U.S. has five confirmed cases of the virus; two cases have been confirmed in California (Orange County and Los Angeles), one in Arizona, one in Seattle, and one in Chicago. Within Canada, there are three confirmed cases two in Toronto and one in British Columbia. As is the case with all other respiratory viruses, the CDC and IPAC recommend everyday preventive actions, including:

- Wash your hands often with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer.
- Avoid touching your eyes, nose, and mouth with unwashed hands.
- Avoid close contact with people who are sick.
- Stay home when you are sick, seek medical attention if any symptoms worsen.
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
- Clean and disinfect frequently touched objects and surfaces.

These are everyday habits that can help prevent the spread of many illnesses. The CDC does have [specific guidance for travelers](#).

As with all aspects of safety, exhibiting extra caution goes a long way. In your home & office environments, and if you have a business or personal travel planned in the near future, please stay safe and use the above tips to protect yourself. Our employee assistance program provider Lifeworks has updated their site with facts regarding the virus which can be found [here](#); you will be required to login in order to access the site. For information on how to register, please see the attached information sheets.

With the continued presence of the 2019-novel coronavirus (now being called COVID-19) in North America, we will be providing you with regular updates and information on the situation, including Algonquin/Liberty's actions to help us all stay healthy and safe. Our pandemic team has been in place from the early stages of this global event; the situation is fluid and we are monitoring it closely so we can share information and tips with you, and take appropriate actions.

What you can do

We all play a role in doing our best to avoid the impacts of this virus. **All employees** should minimize unnecessary travel (see below), stay home if you feel unwell, and contact a medical professional if you have concerning symptoms. **Managers**, ensure employees know where to go if they have questions and report any potential COVID-19 impacts to your site; Tim Deppmeyer, Director, EHS (Timothy.Deppmeyer@libertyutilities.com) is the key contact for questions and overall concerns. You should also review your business continuity plans for unplanned impacts on employees and vendors.

Additionally, we can all take basic measures, such as:

- Wash your hands often with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer.
- Avoid touching your eyes, nose, and mouth with unwashed hands.
- Avoid contact with people who are sick; we recommend not shaking hands, as well.
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
- Clean and disinfect frequently touched objects and surfaces.

These are everyday habits that can help prevent the spread of many illnesses. The CDC does have [specific guidance for travelers](#). You may also wish to view this informative video on COVID-19: <https://www.youtube.com/watch?v=kIL5m5XznNY>.

Business travel

In accordance with governmental guidance ([Canada](#); [U.S.](#)), we ask that employees do not travel to the following countries: China, South Korea, Iran and Northern Italy. We are not currently restricting employee travel to other countries, but encourage you to discuss your travel plans with your manager. Before you travel, check the government website for latest guidance and take necessary precautions when you travel to protect yourself and others.

As with all aspects of safety, exhibiting extra caution goes a long way. In your home and office environments, and if you have a business or personal travel planned in the near future, please stay safe and use the above tips to protect yourself. Our employee assistance program provider Lifeworks has updated their site with facts regarding the virus which can be found [here](#); you will be required to login in order to access the site. For information on how to register, please see the attached information sheets.

A reminder: What is COVID-19?

Coronavirus, or COVID-19, is closely related to the SARS virus and is part of a large family of coronaviruses (CoV). Coronaviruses are transmitted from animals to people, with this particular strain of coronavirus thought to have originated from a seafood market in the city of Wuhan in China in late December of 2019. Symptoms of COVID-19 resemble that of the common cold, with those infected often experiencing fever, coughing, and shortness of breath. However, infection can lead to pneumonia, multi-organ failure, severe acute respiratory syndrome, and even death, in more severe cases. The elderly and those with pre-existing chronic health conditions have accounted for the majority of deaths from COVID-19. Everyone should take the basic precautions to curb the transmission of all infections, including cold and influenza viruses.

On Behalf of Human Resources

In an effort to ensure you feel supported to manage your physical and psychological safety, we would like to provide you with the guidance, support, and resources to manage through the series of events that are transpiring around the world with the Coronavirus, or COVID-19. We've created a [page on The Community](#) where you can find the latest updates on COVID-19 and all previous communications on the topic.

If you have questions about this message or managing COVID-19 concerns personally or for your team, contact Tim Deppmeyer, Director, EHS (Timothy.Deppmeyer@libertyutilities.com).

* * *

To ensure the appropriate diligence and support in keeping everyone safe, we ask that if you or a member within your household have been exposed either through direct contact with someone confirmed or through traveling to an affected country or a high-risk location within the past 14 days, to please speak to public health official or health care practitioner to assess if any precautions should be taken.

If it is found that precautionary measures require you to go into self-isolation for 14 days you will need to advise your leader immediately. Leaders will work with the support of Human Resources to provide you with further guidance on how we can support you.

As we monitor this very fluid situation, HR will provide the appropriate guidance and counsel to leaders and employees as required. We stress that you should take no risk to yourself or your family members if you feel you may have been exposed and are experiencing symptoms of fever, cough and difficulty breathing.

Equally important is your psychological safety. We want to remind you that you and your eligible family members have access to free assistance through our Lifeworks partners. We urge you to leverage these resources whether it's the articles, self-help and or counseling services, they are available to help support you. Please go into **MyHR, Benefits U.S. or Benefits Canada** (see links below)

The energy and services we provide are essential to our customers' lives and wellbeing. From homes to hospitals, elder-care facilities to elementary schools, our customers depend on our ability to continue to provide safe and reliable energy and water services. Being wise and cautious about our own care is not just good for us, but good for those who depend on us as well. It is vital that we use good sense and exercise an abundance of caution to take care of ourselves, our families, and our colleagues during this outbreak.

We thank you for your diligence and commitment and remind you that nothing comes before safety. We will provide further updates as required.

Resources:

- **Employee Assistance Program**

- U.S. Employees: <https://login.lifeworks.com/>
- Canadian Employees: <https://login.lifeworks.com/>

(Provide your work e-mail address, and password. If you forgot your password click forgotten your password)

- [Center for Disease Control \(CDC\) guidance for travelers](#)
- Informational video: <https://www.youtube.com/watch?v=kIL5m5XznNY>
- Government websites to check for updates and travel guidance: [Canada](#); [U.S.](#)

As many of you know, Thursday evening Governor Newsom proclaimed California is implementing a Safer at Home health order that further restricts and limits gathering among people to slow the spread of COVID-19.

Essential businesses, including utilities, will remain in operation. Like physicians, nurses, first responders, and others in similar positions, we play a vital role in the response to this pandemic and the health and wellbeing of our employees, customers and communities.

What does that mean for Liberty employees?

Please continue to operate under the newly established protocol developed and implemented this week. If you have been working from the office, continue to do so. We will issue letters to you Friday which state you work for a water/electric utility and must attend work as part of essential service delivery.

Customer Care: Report to the office as scheduled. As a result of this “at home” ordinance all California walk in centers will be closed effective Mar. 20th until at least April 19th, 2020.

Operations: Continue to operate under the newly established protocol, ensuring you maintain social distancing.

Working at Home: Remain at home.

We continue to monitor this situation by the hour (sometimes it feels by the minute). The situation is fluid and we will update you with any changes to current protocol.

Please expect a call/meeting from you supervisor tomorrow, Friday, March 20. He/She will be able to answer any detailed questions you may have.

Response to Item No. 8

Customer Notices

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Dear Liberty Utilities Customer,

At Liberty Utilities, delivering electricity safely and reliably to our customers is always our primary goal. With the rapidly evolving COVID-19 situation, we wanted to provide you with an update on the actions we're taking across our company to protect the health and safety of our customers and employees and to help ensure that the communities we serve can continue to count on the critical services we provide.

Supporting the health and safety of our employees

- We have a pandemic preparedness plan in place and have established a task force that is working with guidance from the Centers for Disease Control and Prevention (CDC). This task force has spent several weeks preparing for how the virus might impact our organization and the communities we serve, and how to respond appropriately.
- We continue to monitor the situation and actively share updates and information with our employees so that they can keep themselves and their families safe.

- We have provided additional protective supplies and equipment to our frontline employees. We have limited employee travel, limited in-person meetings, and postponed larger gatherings and events.
- To prevent the spread of the virus, we're encouraging anyone who feels sick or has concerns regarding potential exposure to stay at home.

Protecting our customers

- Customers may notice our customer service representatives and field team wearing gloves and additional protective equipment. You may also notice changes in how we greet customers in our contact centers and on service appointments, including social distancing of at least 3 to 6 feet. We hope you understand that this is for both customer and employee protection.
- While our customer walk-in centers remain open to serve you, to practice social distancing, we encourage our customers to utilize our other payment methods available on our website <https://california.libertyutilities.com/north-lake-tahoe/residential/my-account/make-a-payment.html>, and to call us with questions.

Ensuring the delivery of safe and reliable service

Utilities must often respond to extreme conditions and disasters. We plan and practice regularly to help ensure continuity of service. We take this responsibility seriously. As part of our pandemic response, we are implementing our emergency plan and quickly adjusting to conditions of the current COVID-19 situation to ensure safe and reliable service to our customers and communities.

Warmly,



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To assist customers and communities during the rapidly evolving COVID-19 public health emergency, Liberty Utilities has suspended service disconnections for non-payment. This temporary suspension, through at least May 1, 2020, includes residential and business customers.

We encourage customers who have questions or who may be facing potential hardship to contact our customer service departments. We offer a variety of payment options and can assist customers with payment arrangements should they be needed.

"We recognize our customers count on the essential services Liberty provides," said Brent Baker, Liberty Utilities Vice President of Customer Experience Operations. "With the uncertainty surrounding this virus, we want to ensure our customers have access to the services they need to help maintain their health and safety."

Liberty continues to actively monitor the situation, and our teams are taking all necessary measures to ensure the safe and reliable delivery of services to our customers.

For all Liberty Utilities COVID-19 updates, please visit our webpage [HERE](#).

Sincerely,

Frank Heldman
Director of Operations, Liberty Utilities

Response to Item No. 8
Customer Service Office Notice

**In compliance with the Safer at Home Health Order issued by Governor Newsom,
OUR WALK-IN CENTER WILL BE CLOSED UNTIL at least APRIL 19, 2020.**

We apologize for the inconvenience. Please consider using an alternate way to reach us:

Phone

You can call us at 760-247-6484 and we'll be happy to answer your questions. You can also make payments over the phone and check balances.

Online

Visit [our website](#) to find lots of useful information and to make a payment.

Mail

Mail your payment to the address on your bill.

Disconnects for Non-Payment

We have suspended disconnections for non-payment until May 1st for residential and commercial customers. If you are having difficulty paying your bill, please contact us.

**Liberty CalPeco's
Advice Letter 139-E**



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

March 24, 2020

VIA EMAIL ONLY

**Advice Letter 139-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) – Implementation of
Emergency Disaster Relief Program for COVID-19**

Purpose

In accordance with Ordering Paragraph (“OP”) 1 of California Public Utilities Commission (“Commission”) Decision (“D.”) 19-07-015, and the Commission Executive Director’s March 17, 2020 letter addressing Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency, Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty CalPeco”) hereby submits this Tier 1 Advice Letter to notify the Commission that Liberty CalPeco is implementing applicable portions of its Emergency Disaster Relief Program (“EDRP”) for customers impacted by the COVID-19 pandemic.

Background

On March 4, 2020, Governor Gavin Newsom declared a State of Emergency¹ in California as part of the state’s response to address the global outbreak of COVID-19. On March 16, 2020, Governor Newsom issued Executive Order N-28-20,² requesting that the Commission monitor the measures by public and private utility providers to implement customer service protections in response to COVID-19. On March 17, 2020, Commission Executive Director Alice Stebbins directed utilities to submit advice letters implementing the applicable EDRP customer protections set forth in D.19-07-015 and to apply such protections retroactively to March 4, 2020, when the State of Emergency was declared.

Liberty CalPeco recognizes that the services it provides are critical. While the impacts of COVID-19 are evolving quickly, some customers may experience financial difficulty. As an initial response, on March 15, 2020, Liberty CalPeco temporarily suspended service disconnections across its service territory. Two days later, the Commission Executive Director instructed utilities to extend the “applicable customer protections directed in D.19-07-015” to customers in response to the COVID-

¹ Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

² Available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf>.

19 pandemic. Pursuant to this letter, Liberty CalPeco is implementing the applicable customer protections contained in D.19-07-015 for customers impacted by the emergency. As noted in the Commission Executive Director's letter, this emergency has not resulted in disruptions or degradations to utility service, and it is expected that utility services will remain reliable and assist in California's COVID-19 response by allowing more people to safely self-quarantine or work from home. Some of the protections included in D.19-07-015 are not applicable to the current situation.

Eligibility Requirements and Time Limits for Customer Protections

The consumer protections described under the following sections of this letter will be offered to all Liberty CalPeco residential and small business customers in its service territory affected by the COVID-19 emergency.

Liberty CalPeco is committed to implementing these customer protections for up to one year, retroactive to March 4, 2020, which is consistent with the direction provided in D.19-07-015 that customer protections shall conclude no sooner than 12 months from the date of the original emergency declaration, or as appropriately determined by the Governor's Office of Emergency Services.

Liberty CalPeco will continue to carefully monitor the situation. If any adjustments to the customer protections or time limit are merited, Liberty CalPeco will notify the Commission via a Tier 1 advice to any changes to its customer protection measures.

Adopted Customer Protections

Liberty CalPeco is implementing the following EDRP customer protections identified in D.19-07-015. These protections will be applied retroactively to March 4, 2020, and will be made available to all customers affected by COVID-19:

1. Implement payment plan options for residential customers;
2. Suspend disconnection for non-payment and associated fees;
3. Waive deposit and late fee requirements;
4. Suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections; and
5. Discontinue generating all recertification and verification requests that require customers to provide their current income information.

Liberty CalPeco will not implement other customer protections included in D.19-07-015, such as discontinued billing, expedited move-in and move-out service requests, and suspension of estimated bills, because these customer protections are not applicable to this specific emergency. Consistent with D.19-07-015, these customer protections were designed for customers impacted by disasters that require relocation from damaged structures or include disruption or degradation of electric service related to the disaster. These circumstances do not exist in this situation.

Customer Communication Plan

Liberty CalPeco is implementing the following procedures to notify customers and local government representatives on the customer protections outlined in its EDRP:

1. Targeted Outreach to Impacted Customers – Liberty CalPeco has begun notifying impacted customers by mail in the five languages as outlined in its policy and on its website (Under Emergencies & Outages > Emergency Disaster Relief).
2. Local Government Representatives – Liberty CalPeco has started notifying local government and/or elected officials by email that the EDRP is in effect.
3. Outbound Dialing – Within 72 hours of the conclusion of this event, Liberty CalPeco will place calls throughout its territory regarding emergency relief customer protections.
4. Customer Contact Center – Liberty CalPeco has provided its 24-hour emergency representatives with information related to the EDRP.

Participating in or developing community outreach centers is inconsistent with Executive Order N-33-20 to stay home, and therefore Liberty CalPeco does not plan to implement these.

Protecting the Health and Safety of our Employees and Customers

In addition to the customer protection measures and customer outreach plan described above, Liberty CalPeco has implemented the following protective measures to safeguard the health and safety of its employees and customers:

- Liberty CalPeco has a pandemic preparedness plan in place and established a task force that is working with guidance from the Centers for Disease Control and Prevention (“CDC”). This task force has spent several weeks preparing for how the virus might impact the organization and communities served and how to respond appropriately.
- Liberty CalPeco continues to monitor the situation and actively shares updates and information with employees (weekly or more often as needed), so they can keep themselves, their families, and their community safe.
- Liberty CalPeco has deployed social distancing policies, identified key staff, and separated them. Liberty CalPeco has instituted a remote workplace separation program for those business functions for which this is practicable.
- Liberty CalPeco has implemented deep cleaning of offices by a third-party disinfection service.
- Liberty CalPeco has provided customer service representatives and field personnel with gloves and additional protective supplies and requires social distancing of at least six feet for interactions with customers.
- Liberty CalPeco has limited employee travel, suspended in-person meetings, and postponed larger gatherings and events.
- Liberty CalPeco requires employees to follow the CDC recommendations on personal safety, such as frequent hand washing and distancing from others who are sick.
- Liberty CalPeco requires employees who feel sick or have concerns regarding potential exposure to stay at home.

Catastrophic Event Memorandum Account

Pursuant to Ordering Paragraph 5 of D.19-07-015, Liberty CalPeco shall track the incremental costs related to this state of emergency and the implementation of its customer protections in its Catastrophic Event Memorandum Account (“CEMA”). Costs related to COVID-19 will include, but are not limited to, customer outreach, loss of revenue for uncollected bills, and the suspension of late fees.

Effective Date

Pursuant to the letter of Executive Director Stebbins, Liberty CalPeco requests that this Tier 1 Advice Letter be effective March 4, 2020.

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 April 13, 2020, 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, 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 (and by facsimile, if possible) to Liberty CalPeco 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
Fax: 530-544-4811
Email: Dan.Marsh@libertyutilities.com

Notice and Service

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 G.O. 96-B service list. A copy is also being sent to parties on the A.18-03-011 service list. During the COVID-19 pandemic, Liberty CalPeco can only provide electronic copies of this advice letter to the service list.

Energy Division Tariff Unit
California Public Utilities Commission
March 24, 2020
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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
Manager, Rates and Regulatory Affairs
Email: Dan.Marsh@libertyutilities.com

cc: Liberty CalPeco Advice Letter Service List
Service List of R.18-03-011

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: Daniel W. Marsh

Phone #: 562-805-2083

E-mail: Dan.Marsh@libertyutilities.com

E-mail Disposition Notice to: Dan.Marsh@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) #: 139-E

Tier Designation: 1

Subject of AL: Implementation of Emergency Disaster Relief Program for COVID-19.

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 #: D.19-07-015

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: 3/4/20

No. of tariff sheets: 0

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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 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: Dan Marsh
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: 562-805-2083
Facsimile (xxx) xxx-xxxx:
Email: Dan.Marsh@libertyutilities.com

Name:
Title:
Utility Name:
Address:
City: State: California
Telephone (xxx) xxx-xxxx:
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	