



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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In the Matter of Application of West Coast Gas
Company Inc. (U910G) for Approval of Program
Years, 2021-2026 Low-Income Assistance Program
Budgets.

Application 20-03-014

And Related Matters.

Application 20-05-014

Application 20-05-015

Application 20-05-016

Application 20-05-017

Application 20-06-004

**JOINT COMMENTS OF BEAR VALLEY ELECTRIC SERVICE, INC. (U 913 E),
LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933 E), AND ALPINE
NATURAL GAS OPERATING COMPANY NO. 1, LLC (U 909 G) ON THE PROPOSED
DECISION ON THE SMALL AND MULTIJURISDICTIONAL UTILITIES'
CALIFORNIA ALTERNATE RATES FOR ENERGY AND ENERGY SAVINGS
ASSISTANCE PROGRAM APPLICATIONS FOR PROGRAM YEARS 2021-2026**

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SUBJECT INDEX LISTING RECOMMENDED CHANGES

- The Proposed Decision should correct CARE program budgets for BVES, Liberty, and Alpine.
- The Proposed Decision should provide an additional 30 days for the SMJUs to submit a Tier 2 advice letter to implement the PD.

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PROPOSED DECISION ON THE SMALL AND MULTIJURISDICTIONAL
UTILITIES’ CALIFORNIA ALTERNATE RATES FOR ENERGY AND ENERGY
SAVINGS ASSISTANCE PROGRAM APPLICATIONS FOR PROGRAM YEARS
2021-2026**

In accordance with Rule 14.3 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Bear Valley Electric Service, Inc. (“BVES”), Liberty Utilities (CalPeco Electric) LLC (“Liberty”), and Alpine Natural Gas Operating Company No. 1, LLC (“Alpine”) submit these joint comments on the Proposed Decision on the Small and Multi-Jurisdictional Utilities’ California Alternate Rates for Energy and Energy Savings Assistance Program Applications for Program Years 2021-2026 (“Proposed Decision”).¹

¹ Pursuant to Rule 1.8(d), BVES has been authorized to tender these joint comments on behalf of Liberty and Alpine.

I. Comments on the Proposed Decision

A. Corrections to Proposed Decision

1. Approved CARE Program Budgets for Alpine, BVES, and Liberty

Portions of the Proposed Decision include incorrect CARE program budget numbers for BVES and Liberty. Table 5, included in Section 4.4.10.3 on page 55 of the Proposed Decision, provides the total approved CARE administrative budgets. However, the numbers in the table are transposed for BVES and Liberty. To correct the approved CARE program budgets, the numbers currently listed in BVES' row of Table 5 should be listed in Liberty's row, and vice-versa. Similarly, the numbers in the table are transposed for Alpine and West Coast Gas. To correct the approved CARE program budgets, the numbers currently listed in Alpine's row of Table 5 should be listed in West Coast Gas' row, and vice-versa.

2. CARE Subsidy Budget for Liberty

Section 4.4.4 on page 42 of the Proposed Decision states that Liberty's "CARE subsidy totals \$6.033 for PYs 2021-2026, or \$1 million annually (86 percent of total CARE budget)." To avoid confusion and provide clarity, the Proposed Decision should include the word "million" after "\$6.033" to ensure that the total CARE subsidy accurately reflects \$6.033 million.

3. CARE Program Management Budget for Liberty

Section 4.4.4 on page 42 of the Proposed Decision should be updated to reflect the correct budget provided in Table 5, included in Section 4.4.10.3 on page 55 of the Proposed Decision. Currently, Section 4.4.4 states that Liberty's "CARE program management budget totals \$974,720 for PYs 2021-2026, or \$162,450 annually (14 percent of total CARE

budget).” Section 4.4.4 should be corrected to reflect Liberty’s total CARE program management budget of \$974,821 for PYs 2021-2026, or \$162,470 annually.

B. Additional Time Should be Provided to Conform to the New Two-Tier Delivery Model

As outlined in the Proposed Decision:

The SMJUs are to meet and confer, and jointly submit a compliance filing via a Tier 2 advice letter 90 days after the effective date of this decision to categorize the measures approved in their applications into two categories of ESA treatment levels, Basic and Plus, where the Basic level treatment is expected to achieve up to 5 percent in energy savings and the Plus level treatment is expected to achieve up to 15 percent in energy savings.²

BVES, Liberty, and Alpine request additional time to implement and comply with this new requirement, particularly given the expected timing of the adoption of a final decision and the corresponding holiday periods that will fall between the issuance of the final decision and the deadline to submit the Tier 2 advice letter. Specifically, the Proposed Decision should provide an additional 30 days, from 90 days to 120 days, to ensure the utilities can properly incorporate this new requirement.

II. Conclusion

BVES, Liberty, and Alpine appreciate this opportunity to comment on the Proposed Decision and look forward to working with the Commission and interested parties to further improve the CARE and ESA programs. BVES, Liberty, and Alpine recommend that the Proposed Decision be modified as outlined above to accurately reflect program budgets and to

² Proposed Decision, p. 74; *see also* p. 87, Ordering Paragraph 19, and Attachment 1, p. 1.

ensure sufficient time is afforded to implement new requirements. Specific recommended modifications to the Proposed Decision are included in Appendix A.

Dated: October 5, 2021

Respectfully submitted,

/s/

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Appendix A – Recommended Changes to the Proposed Decision

In accordance with Rule 14.3(c) of the Commission’s Rules of Practice and Procedure, BVES, Liberty, and Alpine provides the following recommended changes to the Proposed Decision. Language to be removed is shown in strikethrough and language to be added is underlined.

Language on page 42 in Section 4.4.4 of the Proposed Decision should be modified as follows:

CARE Subsidy Budgets: The CARE subsidy totals \$6.033 million for PYs 2021-2026, or \$1 million annually (86 percent of total CARE budget).

CARE Program Management Budgets: The CARE program management budget totals ~~\$974,720~~ \$974,821 for PYs 2021-2026, or ~~\$162,450~~ \$162,470 annually (14 percent of total CARE budget) with the largest portion of the program management cost attributed to outreach, ...

Table 5: Approved CARE Budgets, PYs 2021-2026 in Section 4.4.10.3 on page 55 of the Proposed Decision should be modified as follows:

SMJU	Approved CARE Administrative Budget and Subsidies						
	2021	2022	2023	2024	2025	2026	Total
West Coast Gas Alpine	\$33,000	\$33,000	\$33,000	\$34,000	\$34,000	\$34,000	\$201,000
Liberty Bear Valley	\$277,521	\$291,397	\$305,967	\$321,266	\$337,329	\$354,195	\$1,887,676
Bear Valley Liberty	\$1,068,494	\$1,071,585	\$1,074,737	\$1,261,222	\$1,264,501	\$1,267,847	\$7,008,387
PacifiCorp	\$3,655,000	\$3,730,000	\$3,807,000	\$3,885,000	\$3,965,000	\$4,041,000	\$23,083,000
Southwest Gas	\$8,462,378	\$8,469,178	\$8,476,114	\$8,483,189	\$8,490,405	\$8,497,765	\$50,879,029
Alpine West Coast Gas	\$13,538	\$13,714	\$13,897	\$14,085	\$14,280	\$14,481	\$83,995
Total	\$13,509,931	\$13,608,875	\$13,710,716	\$13,998,762	\$14,105,515	\$14,209,288	\$83,143,086

Language on page 74 of the Proposed Decision should be modified as follows:

The SMJUs are to meet and confer, and jointly submit a compliance filing via a Tier 2 advice letter ~~90~~ 120 days after the effective date of this decision to categorize the measures approved in their applications into two categories of ESA treatment levels, Basic and Plus, where the Basic level treatment is expected to achieve up to 5 percent in energy savings and the Plus level treatment is expected to achieve up to 15 percent in energy savings.

Language on page 87 of the Proposed Decision should be modified as follows:

As discussed in Section 5.3.9.2, the SMJUs shall meet and confer, and jointly submit a compliance filing via a Tier 2 advice letter within ~~90~~ 120 days after the effective date of this decision.

Ordering Paragraph 19 should be modified as follows:

Alpine Natural Gas Operating Company No. 1, LLC, Golden State Water Company on behalf of Bear Valley Electric Service Division, Liberty Utilities LLC, PacifiCorp, and Southwest Gas Corporation must meet and confer, and jointly submit a compliance filing via a Tier 2 advice ~~90~~ 120 days after the effective date of this decision to categorize the Energy Savings Assistance program measures approved in their applications into two basic categories of treatment levels, Basic and Plus, where the Basic level treatment is expected to achieve up to 5 percent in energy savings and the Plus level treatment is expected to achieve up to 15 percent in energy savings, per Attachment 1.

Language on page 1 of Attachment 1 of the Proposed Decision should be modified as follows:

Alpine Natural Gas Operating Company No. 1, LLC, Golden State Water Company on behalf of Bear Valley Electric Service Division, Liberty Utilities LLC, PacifiCorp, and Southwest Gas Corporation (SMJUs) are to meet and confer, and jointly submit a compliance filing via a Tier 2 advice letter ~~90~~ 120 days after the effective date of this decision to categorize the measures approved in their applications into two basic categories of Energy Savings Assistance (ESA) treatment levels: Basic and Plus.