



**FILED**

03/24/23

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A2105017

# ATTACHMENT A

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

Application of Liberty Utilities (CalPeco Electric) LLC (U 933-E) for Authority to Among Other Things, Increase Its Authorized Revenues for Electric Service, Update Its Energy Cost Adjustment Clause Billing Factors, Establish Marginal Costs, Allocate Revenues, And Design Rates, as of January 1, 2022.

A.21-05-017  
(Filed May 28, 2021)

**ATTACHMENT 1**

**ALL-PARTY SETTLEMENT AGREEMENT ON REVENUE REQUIREMENT ISSUES  
BETWEEN LIBERTY UTILITIES (CALPECO ELECTRIC) LLC, THE PUBLIC  
ADVOCATES OFFICE AT THE CALIFORNIA PUBLIC UTILITIES COMMISSION,  
THE A-3 CUSTOMER COALITION, THE SMALL BUSINESS UTILITY ADVOCATES  
AND THE TAHOE ENERGY RATEPAYERS GROUP**

**1. INTRODUCTION**

- 1.1. In accordance with Rule 12.1(a) of the Commission’s Rules of Practice and Procedure (“Rule”), the RR Settling Parties (as defined in Section 2 below) enter into this All-Party Revenue Requirement Settlement Agreement (“RR Settlement”) for purposes of resolving all but one of the disputed revenue requirement issues.<sup>1</sup>
- 1.2. The RR Settling Parties are filing a Joint Motion for Adoption of the RR Settlement Agreement (“RR Settlement Approval Motion”) that sets forth the factual and legal bases of the RR Settlement; advises the Commission of its scope; and presents the grounds on which Commission approval and adoption are urged.
- 1.3. As the RR Settlement Approval Motion explains, the RR Settlement complies with Commission requirements for approval of settlements, because it is reasonable in light of the whole record, consistent with the law, and in the public interest. Accordingly, the RR Settling Parties respectfully request that the Commission adopt and approve this RR Settlement.
- 1.4. The RR Settling Parties are entering into this RR Settlement to avoid the expense and uncertainty of an evidentiary hearing and to expedite Commission approval of

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<sup>1</sup> The RR Settling Parties represent all the parties to this proceeding.

Liberty's Test Year ("TY") 2022 revenue requirement consistent with this RR Settlement.

- 1.5. Since this RR Settlement represents a compromise by them, the RR Settling Parties have entered into each component of this RR Settlement on the basis that its approval by the Commission not be construed as an admission or concession by any RR Settling Party regarding any fact or matter of law in dispute in this proceeding or in any other proceeding before the Commission. Furthermore, the RR Settling Parties intend that the approval of this RR Settlement by the Commission not be construed as a precedent or statement of policy of any kind for or against any RR Settling Party in any current or future proceeding.
- 1.6. In this RR Settlement, the RR Settling Parties have resolved all issues related to Liberty's TY 2022 revenue requirement with the exception of Liberty's Return on Equity ("ROE"). The RR Settling Parties agree that they will address the ROE issue through briefs.
- 1.7. The revenue figures in this RR Settlement are based upon and reflect Liberty's proposed ROE. The RR Settling Parties agree that the final adopted revenue levels will be adjusted to reflect the Commission adopted ROE.

## **2. DEFINITIONS**

- 2.1. The term "Liberty" means Liberty Utilities (CalPeco Electric) LLC, the Applicant in this proceeding.
- 2.2. The term "Cal Advocates" means the Public Advocates Office at the California Public Utilities Commission.
- 2.3. The term "A-3 CC" means the A-3 Customer Coalition.
- 2.4. The term "SBUA" means the Small Business Utility Advocates.
- 2.5. The term "Tahoe ERG" means the Tahoe Energy Ratepayers Group.
- 2.6. The term "RR Settling Parties" means collectively Liberty, Cal Advocates, A-3 CC, SBUA and Tahoe ERG.
- 2.7. The term "PTAM" means Post-Test Year Adjustment Mechanism.
- 2.8. The term "GRC" means General Rate Case.
- 2.9. The term "O&M" means Operating & Maintenance.
- 2.10. The term "A&G" means Administrative & General.
- 2.11. The term "AMI" means Advanced Metering Infrastructure.
- 2.12. The term "EE" means Energy Efficiency.
- 2.13. The term "SIP" means Solar Initiative Program.
- 2.14. The term "EADIT" means Excess Accumulated Income Tax
- 2.15. The term "COR" means Accumulated Cost of Removal

### **3. EXHIBITS**

- 3.1. This RR Settlement is based on the positions on revenue requirement stated in:
  - 3.1.1. The following prepared Direct Testimony of Liberty, served on May 28, 2021:
    - 3.1.1.1. Exh. Liberty-01: Chapter 1: Policy (Chris Alario)
    - 3.1.1.2. Exh. Liberty-02: Chapter 2: Capital (Travis Johnson)
    - 3.1.1.3. Exh. Liberty-03: Chapter 3: Risk (Rick Dalton)
    - 3.1.1.4. Exh. Liberty-04: Chapter 4: Wildfire Mitigation Plan (Eliot Jones)
    - 3.1.1.5. Exh. Liberty-05: Chapter 5: Public Purpose Programs (Jennifer Guenther)
    - 3.1.1.6. Exh. Liberty-06: Chapter 6: Operating & Maintenance and Administrative & General Expenses (Manasa Rao)
    - 3.1.1.7. Exh. Liberty-07: Chapter 7: Vegetation Management Program (Peter Stoltman)
    - 3.1.1.8. Exh. Liberty-08: Chapter 8: Revenue Requirement (Alysia Maya, Jeff Kijanka and Dan Marsh)
    - 3.1.1.9. Exh. Liberty-10: Chapter 10: Rate of Return (Edward Jackson)
    - 3.1.1.10. Exh. Liberty-11: Chapter 11: Lead-Lag Study (Tim Lyons)
    - 3.1.1.11. Exh. Liberty-12: Chapter 12: Marginal Cost and Rate Design (Tim Lyons and Talha Sheikh)
    - 3.1.1.12. Exh. Liberty-13: Chapter 13: AMI and Customer First Projects (Karen Hall, Rick Dalton and Dan Marsh)
  - 3.1.2. Exh. Liberty-14: Supplemental prepared Direct Testimony (Tim Lyons), served on Sept. 10, 2021.
  - 3.1.3. The following prepared Rebuttal Testimony of Liberty, served on March 23, 2022:
    - 3.1.3.1 Exh. Liberty-15: Capital (Travis Johnson)
    - 3.1.3.2 Exh. Liberty-16: Risk (Rick Dalton)
    - 3.1.3.3 Exh. Liberty-17: Public Purpose Programs (Jennifer Guenther)



- 3.1.3.4 Exh. Liberty-18: O&M and A&G Expenses (Manasa Rao)
- 3.1.3.5 Exh. Liberty-19: Vegetation Management (Peter Stoltzman)
- 3.1.3.6 Exh. Liberty-20: Revenue Requirement and Other Matters (Cindy Fisher, Edward Jackson and Tim Lyons)
- 3.1.3.7 Exh. Liberty-22: Rate Design (Tim Lyons)
- 3.1.3.8 Exh. Liberty-23: AMI and Customer First (Rick Dalton and Karen Hall)
- 3.1.4 The following prepared Direct Testimony of Cal Advocates, served on February 23, 2022:<sup>2</sup>
  - 3.1.4.1 Exh. Cal Advocates-01: Part 1: Executive Summary/Post-Test Year Ratemaking. Part 2: Public Purpose Programs (Charlotte Chitadje)
  - 3.1.4.2 Exh. Cal Advocates-02: Part 1: Summary of Earnings/Revenue Requirement, Rate Base, Taxes, Depreciation. Part 2: Cost of Capital (Scott Ammon and Mark Pocta)
  - 3.1.4.3 Exh. Cal Advocates-03: Operation and Maintenance Expenses, Administrative and General Expenses, and Vegetation Management (Fauzia Nawaz)
  - 3.1.4.4 Exh. Cal Advocates-04: Capital (Nahal Mirfendereski)
  - 3.1.4.5 Exh. Cal Advocates-06: Results of Examination (Fransiska Hadiprodjo)
  - 3.1.4.6 Exh. Cal Advocates-07: Advanced Metering Infrastructure (David Matthews)
  - 3.1.4.7 Exh. Cal Advocates-08: Customer First (Charlotte Chitadje)
  - 3.1.4.8 Exh. Cal Advocates-09: Proposals for Wildfire Mitigation Cost Recovery And Direct Current Fast Charging (DCFC) Tariff Schedules (Otto Nichols)
  - 3.1.4.9 Exh. Cal Advocates-10: Risk-Based Decision Making Framework (Matthew Taul)
- 3.1.5 Exh. Cal Advocates-11: Work Papers (Nahal Mirfendereski), dated July 12, 2022.
- 3.1.6 Exh. A-3 CC-01: Prepared Testimony of Geoffrey B. Inge, dated February 23, 2022.
- 3.1.7 Exh. A-3 CC-02: Prepared Rebuttal Testimony of Geoffrey B. Inge, dated March 23, 2022.

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<sup>2</sup> Cal Advocates did not prepare or serve any rebuttal testimony.

- 3.1.8 Exh. SBUA-01: Testimony of Paul L. Chernick and John D. Wilson, dated February 23, 2022.
- 3.1.9 Exh. SBUA-02: Rebuttal Testimony of Paul L. Chernick and John D. Wilson, dated March 23, 2022.
- 3.1.10 Exh. Tahoe ERG-01: Testimony of James D. Wood, dated February 23, 2022.
- 3.1.11 Exh. Tahoe ERG-02: Testimony of Karen L. Miller, dated February 23, 2022.<sup>3</sup>

#### **4. TERMS AND CONDITIONS REGARDING REVENUE REQUIREMENT**

- 4.1. This section describes all the stipulated forecasts and amounts for Liberty's Test Year TY 2022 GRC revenue requirement resolved by this RR Settlement.
- 4.2. Appendix A to this RR Settlement provides a comprehensive comparison of all participating parties' original and settled positions for all contested issues resolved by this RR Settlement as well as the separate Residential Rate Design Settlement Agreement and Marginal Cost, Revenue Allocation and Rate Design Settlement Agreement.<sup>4</sup> The comparison of the RR Settling Parties' original proposals on revenue requirement that have been resolved by this RR Settlement can be found on pp.1-9 of Appendix A. In the event of a conflict between the terms of this RR Settlement and Appendix A, the terms of this RR Settlement shall control.
- 4.3. **Operating Revenues**
  - 4.3.1. Sales Revenue: \$122,144,000
  - 4.3.2. Other Operating Revenue: \$519,000
  - 4.3.3. Revenue Credits: \$924,000
  - 4.3.4. Energy Efficiency: \$250,000
  - 4.3.5. Solar Initiative Program: \$423,000
  - 4.3.6. Other Revenue Accounts: \$13,827,000
- 4.4. **Operating Expenses**
  - 4.4.1. Fuel & Purchased Power: \$24,986,000

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<sup>3</sup> Tahoe ERG did not prepare or serve any rebuttal testimony.

<sup>4</sup> A single comprehensive comparison of all settled issues in this proceeding is provided in Appendix A since some of the issues resolved in this RR Settlement are dependent upon or influenced the resolution of issues in the other two settlements.

- 4.4.2. EE, SIP: \$672,239
- 4.4.3. Other O&M Expense: \$45,055,255
  - 4.4.3.1. Ongoing O&M and A&G Expenses: \$25,141,505
  - 4.4.3.2. Wildfire Mitigation Expense: \$1,750,000
  - 4.4.3.3. Wildfire Insurance Expense: \$7,163,750
  - 4.4.3.4. Vegetation Management Expense: \$11,000,000
- 4.5. **Depreciation and Amortization Expense:** \$15,068,000
- 4.6. **Taxes Other Than Income:** \$ 6,794,000
- 4.7. **Deferred Income Taxes:** \$1,665,000
- 4.8. **EADIT Amortization:** \$(148,000)
- 4.9. **Federal Income Tax:** \$ 2,957,000
- 4.10. **California Corporate Franchise Tax:** \$523,000
- 4.11. **Capital Expenditures:**<sup>5</sup>
  - 4.11.1. **2021:** \$35,200,000
  - 4.11.2. **2022:** \$53,443,000
  - 4.11.3. Liberty may use its existing PTAM to adjust its authorized revenue requirement for 2023 and 2024 capital expenditures of \$64,000,000, as described in Section 4.12.3
- 4.12. **Other Issues:**
  - 4.12.1. **GRC Cycle:** Liberty will use a three (3) year cycle for this GRC Application. Liberty's next GRC application will be for Test Year 2025.
  - 4.12.2. **Customer First and AMI:** The RR Settling Parties agree to a forecast for Liberty's 2023 Customer First and AMI capital expenses of \$23,351,000 for Customer First and \$19,751,248 for AMI. The RR Settling Parties agree that Liberty can recover the costs associated with Customer First and AMI via a Tier 2 advice letter once the projects are considered used and useful. The RR Settling Parties also agree to remove the \$75 AMI opt-out fee included in Liberty's original proposal.
  - 4.12.3. **PTAM Treatment for 2023 and 2024 Capital Expenditures:** Liberty may use its existing PTAM to adjust its authorized revenue requirement for any or all of the capital projects described in Section 4.11.3, subject to

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<sup>5</sup> Details of the stipulated Capital Expenditures are provided in Appendix B.

the following maximum capital expenditure amounts for each capital project category, collectively totaling \$64,000,000 for the two-year period 2023-2024. Liberty may recover 2023-2024 capital expenditures through its existing PTAM mechanism in 2023 or 2024 in the year the capital closes to plant. Liberty agrees that using PTAM to adjust the authorized revenue requirement for 2023 and 2024 capital expenditures is an integrated part of the overall settlement in this proceeding and will not to be considered precedential in Liberty's next GRC application.

4.12.3.1. Safety and Reliability – Distribution: \$15,000,000

4.12.3.2. Safety and Reliability – Substation: \$17,000,000

4.12.3.3. Wildfire Mitigation – Covered Conductor: \$17,000,000

4.12.3.4. Wildfire Mitigation – Other: \$10,000,000

4.12.3.5. Customer Driven: \$0

4.12.3.6. Other Capital Projects: \$5,000,000

4.12.4. **Rule 20A – National to Beach Project:** Liberty may request, in a Tier 2 advice letter following completion of the Rule 20A – National to Beach project, that Liberty be allowed to recover the project's capital costs in rates.

4.13. **Rate Base:** Based on stipulated amounts for 2021-2022 capital expenditures and the other amounts and forecasts described in this Section 4, the forecast for Liberty's TY 2022 Rate Base is \$365,238,000, as described below.

4.13.1. **Net Plant in Service:** \$442,652,000

4.13.1.1. Gross Plant in Service: \$551,872,000

4.13.1.2. Accumulated Depreciation Reserve: \$(108,220,000)

4.13.2. **Rate Base Additions:** \$13,841,000

4.13.2.1. Materials & Supplies: \$7,741,000

4.13.2.2. Other Working Capital (net): \$5,100,000

4.13.2.3. Working Cash: \$1,000,000

4.13.3. **Rate Base Deductions:** \$(92,255,000)

4.13.3.1. Customer Advances for Construction: \$(17,590,000)

4.13.3.2. Accumulated Deferred Income Tax: \$(42,524,000)

4.13.3.3. Other Deductions – COR & EADIT: \$(32,140,000)

- 4.14. **Capital Structure:** Liberty’s debt/equity structure for the TY 2022 GRC cycle will be maintained at Liberty’s currently authorized ratio of Long-Term Debt of 47.5 percent and Common Equity of 52.5 percent.<sup>6</sup>

## 5. Other Terms and Conditions

- 5.1. **Commission’s Primary Jurisdiction.** The RR Settling Parties agree that the Commission has primary jurisdiction over any interpretation, enforcement, or remedies regarding this RR Settlement. None of the RR Settling Parties may bring an action regarding this RR Settlement in any court or before another administrative agency without having first exhausted its administrative remedies at the Commission.
- 5.2. **Further Actions.** The RR Settling Parties acknowledge that this RR Settlement is subject to approval by the Commission. As soon as practicable after all the RR Settling Parties have signed the RR Settlement, the RR Settling Parties through their respective attorneys will prepare and file the RR Settlement Approval Motion. The RR Settling Parties will furnish such additional information, documents, or testimonies as the Commission may require for purposes of granting the RR Settlement Approval Motion and approving and adopting the RR Settlement.
- 5.3. **No Personal Liability.** None of the RR Settling Parties, or their respective employees, attorneys, or any other individual representative or agent, assumes any personal liability as a result of the RR Settling Parties signing this RR Settlement.
- 5.4. **Non-Severability.** The provisions of this RR Settlement are non-severable. If any of the RR Settling Parties fails to perform its respective obligations under this RR Settlement, the RR Settlement will be regarded as rescinded.
- 5.5. **Voluntary and Knowing Acceptance.** Each RR Settling Party hereto acknowledges and stipulates that it is agreeing to this RR Settlement freely, voluntarily, and without any fraud, duress, or undue influence by any other RR Settling Party. Each RR Settling Party has read and fully understands its rights, privileges, and duties under this RR Settlement, including its right to discuss this RR Settlement with its legal counsel, which has been exercised to the extent deemed necessary.
- 5.6. **No Modification.** This RR Settlement constitutes the entire settlement among the RR Settling Parties regarding the matters set forth herein, which may not be altered, amended, or modified in any respect except in writing and with the express written and signed consent of all the RR Settling Parties hereto.
- 5.7. **No Reliance.** None of the RR Settling Parties has relied or presently relies on any statement, promise, or representation by any other RR Settling Party, whether oral

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<sup>6</sup> D.20-08-030, Conclusions of Law no.18.

or written, except as specifically set forth in this RR Settlement. Each RR Settling Party expressly assumes the risk of any mistake of law or fact made by such RR Settling Party or its authorized representative.

- 5.8. **Counterparts.** This RR Settlement may be executed in separate counterparts by the different RR Settling Parties hereto and all so executed will be binding and have the same effect as if all the RR Settling Parties had signed one and the same document. All such counterparts will be deemed to be an original and together constitute one and the same RR Settlement, notwithstanding that the signatures of all the RR Settling Parties and/or of a RR Settling Party's attorney or other representative do not appear on the same page of this RR Settlement or the related RR Settlement Approval Motion.
- 5.9. **Binding upon Full Execution.** This RR Settlement will become effective and binding on each of the RR Settling Parties as of the date when it is fully executed. It will also be binding upon each of the RR Settling Parties' respective successors, subsidiaries, or affiliates.
- 5.10. **Commission Adoption Not Precedential.** In accordance with Rule 12.5, the RR Settling Parties agree and acknowledge that unless the Commission expressly provides otherwise, the Commission's adoption of this RR Settlement does not constitute approval of or precedent regarding any principle or issue of law or fact in this or any other current or future proceeding.
- 5.11. **Enforceability.** The RR Settling Parties agree and acknowledge that after issuance of a Commission decision approving and adopting this RR Settlement, the Commission may reassert jurisdiction and reopen this proceeding to enforce the terms and conditions of this RR Settlement.
- 5.12. **Finality.** Once fully executed by the RR Settling Parties and adopted and approved by a Commission decision, this RR Settlement fully and finally settles any and all disputes regarding the issues described in this RR Settlement between the RR Settling Parties in this proceeding, unless otherwise specifically provided in the RR Settlement.
- 5.13. **No Admission.** Nothing in this RR Settlement or related negotiations may be construed as an admission of any law or fact by any of the RR Settling Parties, or as precedential or binding on any of the RR Settling Parties in any other proceeding, whether before the Commission, in any court, or in any other state or federal administrative agency. Further, unless expressly stated herein this RR Settlement does not constitute an acknowledgement, admission, or acceptance by any of the RR Settling Parties regarding any issue of law or fact in this matter, or the validity or invalidity of any particular method, theory, or principle of ratemaking or regulation in this or any other proceeding.
- 5.14. **Authority to Sign.** Each RR Settling Party who executes this RR Settlement represents and warrants to each other RR Settling Party that the individual signing this RR Settlement and the related RR Settlement Approval Motion has the legal authority to do so on behalf of the RR Settling Party.

- 5.15. **Limited Admissibility.** Each RR Settling Party signing this RR Settlement agrees and acknowledges that this RR Settlement will be admissible in any subsequent Commission proceeding for the sole purpose of enforcing the Terms and Conditions of this RR Settlement.
- 5.16. **Estoppel or Waiver.** Unless expressly stated herein, the RR Settling Parties execution of this RR Settlement is not intended to provide any of the RR Settling Parties in any manner a basis of estoppel or waiver in this or any other proceeding.
- 5.17. **Rescission.** If the Commission, any court, or any other state or federal administrative agency, rejects or materially alters any provision of the RR Settlement, it will be deemed rescinded by the RR Settling Parties and of no legal effect as of the date of issuance of the Commission decision or final ruling, decision, or modification by any court or any other state or federal administrative agency, rejecting or materially altering the RR Settlement. The RR Settling Parties may negotiate in good faith regarding whether they want to accept the changes by the Commission, any court, or any other state or federal administrative agency, and resubmit a revised RR Settlement to the Commission.

## 6. Conclusion

- 6.1. Each of the RR Settling Parties has executed this RR Settlement as of the date appearing below their respective signatures.

[SIGNATURE PAGES FOLLOW NEXT]

IN WITNESS WHEREOF, the RR Settling Parties have fully executed this RR Settlement as of July \_\_\_, 2022.

**THE PUBLIC ADVOCATES OFFICE AT  
THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

\_\_\_\_\_  
Name:  
Title:  
Dated: \_\_\_\_\_

\_\_\_\_\_  
Edward Jackson  
President (California)  
Dated: July 27, 2022

**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

\_\_\_\_\_  
Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: \_\_\_\_\_

\_\_\_\_\_  
Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**

\_\_\_\_\_  
Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: \_\_\_\_\_



IN WITNESS WHEREOF, the RR Settling Parties have fully executed this RR Settlement as of July \_\_\_, 2022.

**THE PUBLIC ADVOCATES OFFICE AT  
THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION**



Linda Serizawa  
Deputy Director  
Dated: July 26, 2022

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

Edward Jackson  
President (California)  
Dated: \_\_\_\_\_

**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: \_\_\_\_\_

Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**

Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: \_\_\_\_\_

IN WITNESS WHEREOF, the RR Settling Parties have fully executed this RR Settlement as of July \_\_\_, 2022.

**THE PUBLIC ADVOCATES OFFICE AT  
THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

\_\_\_\_\_  
Name:

Title:

Dated: \_\_\_\_\_

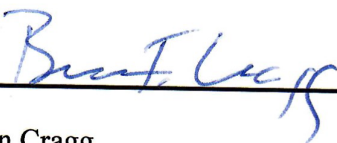
\_\_\_\_\_  
Edward Jackson

President (California)

Dated: \_\_\_\_\_

**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

\_\_\_\_\_  


Brian Cragg

Attorney for A-3 Customer Coalition

Dated: July 22, 2022

\_\_\_\_\_  
Jennifer Weberski

Attorney for Small Business Utility Advocates

Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**

\_\_\_\_\_  
Anita Taff-Rice

Attorney for Tahoe Energy Ratepayers Group

Dated: \_\_\_\_\_

IN WITNESS WHEREOF, the RR Settling Parties have fully executed this RR Settlement as of July \_\_\_, 2022.

**THE PUBLIC ADVOCATES OFFICE AT  
THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

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Name:  
Title:  
Dated: \_\_\_\_\_

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Edward Jackson  
President (California)  
Dated: \_\_\_\_\_

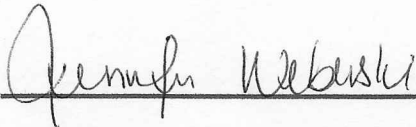
**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

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Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: \_\_\_\_\_

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Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: 7/26/22

**TAHOE ENERGY RATEPAYERS GROUP**

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Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: \_\_\_\_\_

IN WITNESS WHEREOF, the RR Settling Parties have fully executed this RR Settlement as of July \_\_\_, 2022.

**THE PUBLIC ADVOCATES OFFICE AT  
THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

\_\_\_\_\_  
Name:  
Title:  
Dated: \_\_\_\_\_

\_\_\_\_\_  
Edward Jackson  
President (California)  
Dated: \_\_\_\_\_

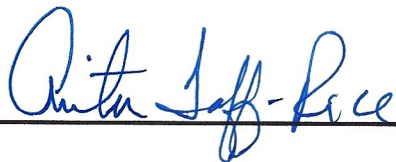
**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

\_\_\_\_\_  
Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: \_\_\_\_\_

\_\_\_\_\_  
Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**

  
\_\_\_\_\_

Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: 7/27/22

**APPENDIX A**

**CONSOLIDATED COMPARISON EXHIBIT**

**Comparison of Original Party Positions on All Settled Issues**

# CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

## REVENUE REQUIREMENT

Capital (2021-2022)  
\$(000)

	Liberty			Cal Advocates			Settled Position		
	2021	2022	Total	2021	2022	Total	2021	2022	Total
<b>Distribution</b>									
Pole Replacements Per Test	663	681	1,343	470	483	953	470	483	953
Overhead Failures/Services	1,692	1,738	3,430	1,692	1,738	3,430	1,692	1,738	3,430
Underground Failures/Services	1,034	1,062	2,096	1,034	1,062	2,096	1,034	1,062	2,096
Distribution Rebuilds – OH	3,224	3,313	6,536	2,296	2,360	4,656	2,296	2,500	4,796
Distribution Rebuilds – UG	2,192	1,468	3,660	243	728	971	361	1,500	1,861
Submersible Transformer Replace	500	5	505	500	5	505	500	5	505
Claims	419	430	849	122	126	248	419	430	849
Street & Highway Improvements	336	345	681	336	345	681	336	345	681
<b>Total Distribution</b>	10,058	9,042	19,100	6,693	6,847	13,540	7,108	8,063	15,171
<b>Substation</b>									
625/650 Phase 2B	7,074	-	7,074	7,074	-	7,074	7,074	-	7,074
Portola Substation	500	5,500	6,000	-	-	-	-	-	-
Squaw Valley Substation	-	100	100	-	100	100	-	100	100
Squaw Valley/Tahoe City CBs	382	400	782	382	400	782	382	400	782
Stampede Substation	25	1,450	1,475	-	-	-	25	-	25
Stateline Substation	-	100	100	-	100	100	-	100	100
Prosser Substation	0	25	25	-	25	25	-	25	25
Substation Fencing	561	50	611	561	50	611	561	50	611
Emergency Substation Equipment	625	642	1,267	625	642	1,267	625	642	1,267
Substation Spare Transformer	25	900	925	25	900	925	25	900	925
Other Substation Capital	332	96	428	332	96	428	332	96	428
<b>Total Substation</b>	9,523	9,263	18,786	8,999	2,313	11,312	1,950	9,387	11,337

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

	Liberty			Cal Advocates			Settled Position		
	2021	2022	Total	2021	2022	Total	2021	2022	Total
<b>WMP Covered Conductor</b>									
Tahoe City 7300	1,259	788	2,047	1,259	788	2,047	1,259	788	2,047
Topaz 1261	1,461	-	1,461	300	-	300	300	500	800
Meyers 3300	2,303	3,235	5,538	2,303	3,235	5,538	2,303	3,235	5,538
Meyers 3400	9,480	2,000	11,480	3,800	820	4,620	4,990	3,000	7,990
640A Line	50	3,465	3,515	-	-	-	-	50	50
640B Line	50	50	100	-	-	-	-	100	100
Brockway 5100	-	100	100	-	-	-	-	100	100
Brockway 4202	937	-	937	-	-	-	644	293	937
Stateline 2300	25	558	583	-	-	-	-	25	25
Hobart 7700	4,099	-	4,099	-	-	-	450	3,649	4,099
<b>Total WMP Covered Conductor</b>	19,664	10,196	29,860	7,662	4,843	12,505	9,946	11,740	21,686
<b>WMP Other</b>									
Pole Replacements	10,500	2,500	13,000	4,500	2,500	7,000	4,500	4,500	9,000
Fuse Replacements	867	891	1,758	60	63	123	867	891	1,758
Tree Attachments	664	682	1,346	560	573	1,133	560	573	1,133
Wire Upgrades	600	350	950	10	10	20	600	350	950
Auto Reclosers	300	360	660	110	134	244	300	360	660
CALFire Exempt Hardware	-	500	500	-	500	500	-	500	500
Substation Animal Guarding	804	804	1,608	-	-	-	804	300	1,104
Emerging Technologies	200	200	400	-	-	-	-	-	-
Weather Stations	120	15	135	-	-	-	-	135	135
DFA	50	100	150	-	-	-	-	150	150
HIFD	-	100	100	-	100	100	-	100	100
LiDAR	400	-	400	2	-	2	400	-	400
T&E	98	-	98	50	-	50	50	-	50
<b>Total WMP Other</b>	14,603	6,502	21,104	5,292	3,880	9,172	8,081	7,859	15,940

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

	Liberty			Cal Advocates			Settled Position		
	2021	2022	Total	2021	2022	Total	2021	2022	Total
<b>Customer-Driven</b>									
New Business	3,518	3,615	7,133	3,518	3,615	7,133	3,518	3,615	7,133
Rule 20A – Apache	250	-	250	250	-	250	250	-	250
Rule 20A – National to Beach	1,095	6,154	7,250	350	1,970	2,320	-	-	-
Rule 20A – Johnson Boulevard	100	600	700	-	-	-	-	100	100
<b>Total Customer-Driven</b>	4,964	10,369	15,333	4,118	5,585	9,703	3,768	3,715	7,483
<b>Other Capital Projects</b>									
Information Technology	870	806	1,676	466	436	902	870	500	1,370
MHP Conversions	400	-	400	186	0	186	400	-	400
Fleet Replacements	300	1,850	2,150	10	56	66	300	850	1,150
Transportation Electrification	1,117	1,888	3,004	142	246	388	1,117	800	1,917
GIS	873	1,515	2,388	-	-	-	873	1,515	2,388
Building Remodels/Renovations	9,202	700	9,902	30	550	580	787	9,014	9,801
<b>Total Other Capital Projects</b>	12,762	6,760	19,521	834	1,288	2,122	4,347	12,679	17,026
<b>GRAND TOTAL</b>	71,573	52,132	123,705	33,598	24,756	58,354	35,200	53,443	88,643



## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Capital (2023-2024) PTAM \$(000)

Issue	Liberty	Cal Advocates	Settled Position
Safety and Reliability – Distribution	18,402	14,149	15,000
Safety and Reliability – Substation	18,772	15,970	17,000
WMP – Covered Conductor	24,052	6,454	17,000
WMP – Other	11,157	7,714	10,000
Customer Driven	12,013	1,307	-
Other Capital Projects	14,810	2,828	5,000
<b>GRAND TOTAL</b>	<b>99,205</b>	<b>48,422</b>	<b>64,000</b>

### Treatment of Other Capital Projects

Issue	Liberty	Cal Advocates	Settled Position
<b>Customer First</b>	Liberty proposed recovery via a Tier 2 Advice Letter once the Customer First project is considered used and useful.	Cal Advocates opposed Liberty's request associated with the Customer First project based on the following: 1) the projected costs and benefits allocated to Liberty are unsupported; 2) the total forecasted costs allocated to Liberty over the lifetime of the project is substantially higher than its projected savings, and 3) Liberty's ratepayers alone should not absorb all the costs associated with the Customer First project.	Liberty to recover costs via a Tier 2 Advice Letter once the project is considered used and useful.
<b>AMI</b>	Liberty proposed recovery via a Tier 2 Advice Letter once the AMI project is considered used and useful.	No opposition to AMI project, project costs, or recovery mechanism.	Liberty to recover costs via a Tier 2 Advice Letter once the project is considered used and useful.
<b>Rule 20A – National to Beach</b>	Liberty included this project in its capital forecast and proposed recovery in rates for 2021-2022 costs and PTAM recovery for 2023 costs.	Proposed reduced cost forecast for this project and opposed PTAM recovery eligibility for 2023 costs.	Liberty to recover costs via a Tier 2 Advice Letter once the project is considered used and useful.

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### O&M and A&G Expenses \$(000)

Account	Description	Liberty	Cal Advocates	Settled Position
	<b>Other Power Generation</b>			
549	Miscellaneous Other Power Generation	209	209	209
553	Maintenance of Generating and Electric Plant	707	707	707
554	Miscellaneous Other Power Generation Plant	35	35	35
	<b>Total Other Power Generation</b>	951	951	951
	<b>Distribution Expense</b>			
580	Supervision & Engineering	255	240	240
581	Load Dispatching	720	181	636
582	Station Expenses	28	28	28
583	Overhead Line Expenses	89	89	89
584	Underground Line Expenses	56	56	56
585	Street Lighting and Signal Systems	2	2	2
586	Meter Expenses	9	9	9
588	Miscellaneous Distribution Expenses	2,284	2,211	2,284
591	Structures	27	27	27
592	Station Equipment	82	82	82
593	Overhead Lines	2,288	1,954	2,000
594	Underground Lines	563	563	563
596	Street Light and Signal Systems	9	9	9
597	Meters	69	69	69
598	Miscellaneous Distribution Plant	817	817	817
	<b>Total Distribution Expenses</b>	7,297	6,337	6,911
	<b>Wildfire Mitigation and Vegetation Management</b>			
599	Wildfire Mitigation Expenses	2,468	806	1,750
599	Wildfire Insurance	10,438	7,164	7,164
599	Vegetation Management	13,785	8,717	11,000
	<b>Total Wildfire Mitigation and Vegetation Management</b>	26,691	16,687	19,914
	<b>Customer Accounts Expense</b>			
902	Meter Reading Expense	378	349	349
903	Customer Records and Collection Expense	1,538	1,453	1,453
904	Uncollectible Accounts	192	192	192
907	Supervision	288	265	265

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Account	Description	Liberty	Cal Advocates	Settled Position
908	Customer Assistance Expenses	1,376	1,123	1,376
910	Miscellaneous Customer Service and Informational	50	28	28
	<b>Total Customer Accounts Expense</b>	3,821	3,409	3,663
	<b>Administrative and General Expenses</b>			
920	Administrative and General Salaries	9,228	9,216	9,216
921	Office Supplies and Expenses	1,802	1,692	1,747
922	Administrative Expense Transferred	(3,143)	(3,143)	(3,143)
923	Outside Services Employed	1,613	1,580	1,580
924	Property Insurance	736	736	736
925	Injuries and Damages	734	734	734
926	Pensions and Benefits	2,087	1,927	2,087
928	Regulatory Commission Expenses	250	250	250
930	Miscellaneous General Expenses	73	42	42
931	Rents	1	1	1
935	Maintenance of General Plant	368	368	368
	<b>Total Administrative and General Expense</b>	13,749	13,402	13,617
	<b>TOTAL O&amp;M and A&amp;G EXPENSES</b>	52,510	40,786	45,055

### Operating Revenues \$(000)

Issue	Liberty	Cal Advocates	Settled Position
Sales Revenue	134,923	113,004	n/a
Other Operating Revenue	519	519	519
Revenue Credits	924	924	924
Energy Efficiency	476	250	250
Solar Initiative Program	423	423	423
Other Memo Accounts	13,827	13,827	13,827
<b>Total Operating Revenues</b>	151,091	128,948	n/a

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Operating Expenses \$(000)

Issue	Liberty	Cal Advocates	Settled Position
Fuel and Purchased Power	24,986	24,986	24,986
VM, CEMA, EE, SIP, BRRBA	14,726	14,500	14,500
Other O&M Expense	52,466	40,740	45,009
Depreciation and Amortization Expense	17,054	15,653	15,068
Taxes Other Than Income	6,888	6,726	6,794
Deferred Income Taxes	2,124	2,124	1,665
EADIT Amortization	(148)	(148)	(148)
Federal Income Tax	3,465	1,801	2,957
California Corporate Franchise Tax	441	124	523
<b>Total Operating Expenses</b>	<b>122,002</b>	<b>106,507</b>	<b>111,354</b>

### 2022 Rate Base \$(000)

Issue	Liberty	Cal Advocates	Settled Position
<b>Net Plant In Service</b>			
Gross Plant In Service	578,804	525,208	551,872
Accumulated Provision for Depreciation and Amortization	(109,369)	(108,683)	(108,220)
<b>Net Plant In Service</b>	<b>469,435</b>	<b>416,525</b>	<b>443,652</b>
<b>Additions</b>			
Materials and Supplies	7,741	7,741	7,741
Other Working Capital (Net)	5,834	4,351	5,100
Working Cash	2,052	-	1,000
<b>Total Additions</b>	<b>15,627</b>	<b>12,092</b>	<b>13,841</b>
<b>Deductions</b>			
Customer Advances for Construction	(17,590)	(17,590)	(17,590)
Accumulated Deferred Income Tax	(43,444)	(43,443)	(42,524)
Other Deductions – COR and EADIT	(32,140)	(32,140)	(32,140)
<b>Total Deductions</b>	<b>(93,175)</b>	<b>(93,174)</b>	<b>(92,255)</b>
<b>TOTAL RATE BASE</b>	<b>391,888</b>	<b>335,443</b>	<b>365,238</b>

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Depreciation Rates

Account	Description	Liberty	Cal Advocates	Settled Position
303	Software	10.14%	10.14%	10.14%
341	Structures and Improvements	1.89%	1.89%	1.89%
342	Fuel Holders, Prod, and Acc	1.92%	1.92%	1.92%
344	Generators	1.87%	1.87%	1.87%
346	Misc. Power Equipment	1.74%	1.74%	1.74%
360.2	Land Rights	0.66%	0.56%	0.56%
361	Structures and Improvements	1.92%	1.75%	1.75%
362	Station Equipment	1.74%	1.40%	1.40%
364	Poles, Towers, and Fixtures	2.54%	2.31%	2.31%
365	Overhead Conductors and Devices	3.00%	2.59%	2.59%
366	Underground Conduit	1.45%	1.41%	1.41%
367	Underground Conductor and Devices	2.53%	2.53%	2.53%
368	Line Transformers	2.61%	1.97%	1.97%
369	Services	1.93%	1.53%	1.53%
370	Meters	4.60%	2.28%	2.28%
371	Installs Customer Premise	3.19%	2.51%	2.51%
373	Street Lighting and Signal Systems	2.48%	2.38%	2.38%
389	Land Rights	1.32%	1.32%	1.32%
390	Structures and Improvements	1.63%	1.63%	1.63%
391	Office Furniture and Equipment	5.00%	5.00%	5.00%
392.1	Autos	5.95%	5.95%	5.95%
393	Stores Equipment	5.00%	5.00%	5.00%
394	Tool, Shop, and Garage Equipment	4.00%	4.00%	4.00%
396	Power Operated Equipment	5.72%	5.72%	5.72%
397	Communications Equipment	6.67%	6.67%	6.67%
398	Miscellaneous Equipment	5.00%	5.00%	5.00%

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Cost of Capital

Issue	Liberty	Cal Advocates	Settled Position
Capital Structure – Debt	46.0%	47.5%	47.5%
Capital Structure - Equity	54.0%	52.5%	52.5%
Cost of Debt	3.81%	3.81%	3.81%
Return on Equity	10.5%	9.3%	n/a
Rate of Return	7.42%	6.69%	n/a

### Other Issues

Issue	Liberty	Cal Advocates	Settled Position
GRC Rate Cycle	Remain on three-year rate cycle	Proposes moving to a four-year cycle	Liberty to remain on a three-year cycle, with the next GRC being a 2025 Test Year.
PTAM Treatment	Proposes recovery of PTAM eligible projects in 2023 and 2024	Proposes recovery of capital via PTAM similar to what was authorized in the 2019 GRC Decision.	The PTAM eligible amounts would cover 2023-2024 by category over the two-year window, regardless of the year the capital closes to plant. See Capital (2023-2024) PTAM table above.

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### REVENUE ALLOCATION AND RATE DESIGN

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Determination of class revenue targets</b>	Proposes Equal Percentage of the Marginal Cost (EPMC) based revenue allocation with Residential Permanent and A-1 rates capped at overall increase	Proposes uniform increase to all classes based on overall increase	Accepts application of cap only on Residential Permanent and A-1. Proposes determination of revenues based on % marginal costs for generation, distribution demand, and distribution customer	Accepts Liberty's position	<p>Rejects Liberty's proposed revenues for non-permanent residential customers. Rates should be designed based on time of use and usage amount, not customer class.</p> <p>Opposed allocation of new hookup costs solely to non-permanent customers.</p> <p>Proposed adding specific definition for permanent residential customer to Liberty's tariff requiring 183 days of cumulative occupancy in home to qualify as permanent resident.</p> <p>Liberty should provide annual outreach to residential customers providing information about how to verify they are correctly classified as permanent or non-permanent and how to switch to the correct residential</p>	Cap and Collar mechanism implemented for non-wildfire costs, with cap at 75% of overall increase (39.8%) and floor at 14.5% of overall increase (19.4%).

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
					classification if there is an error.	
<b>Allocation of wildfire costs</b>	Proposes allocation of wildfire costs based on demand-related distribution marginal costs	Does not support separate wildfire cost allocation	Proposes wildfire costs be included as part of allocation of distribution demand costs.	Proposes allocation of wildfire costs based on 50% distribution demand cost allocation and 50% based on number of customers.		Wildfire costs allocated based on agreed upon allocation factors.
<b>Wildfire cost recovery</b>	Proposes recovery of wildfire costs via separate wildfire fixed charges	Does not support recovery of wildfire costs through fixed charges as it violates PU Code	Proposes wildfire costs be recovered through energy and/or demand charges	Accepts cost recovery through wildfire charges		Wildfire costs recovered through rate elements. No separate wildfire fixed charge
<b>Residential Permanent Rate Design</b>	Proposes uniform increase in all rate elements. Proposes Tier III energy charges	Accepts uniform increase in rate elements. Does not support proposed Tier III charges	Proposes rates to be aligned with class marginal costs of service.		<p>Opposed creation of Tier III for non-permanent residential customers and uniform rates for permanent and non-permanent residential customers in Tier II.</p> <p>Equal allocation of between non-permanent and permanent residential classes rather than 100 percent to non-permanent.</p>	Customer charge increased to \$12.00, consistent with PU Code. Tier II energy charges designed to recover marginal costs. No Tier III charges.



## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Residential Non-Permanent Rate Design</b>	Proposes separate rates for residential non-permanent customers. Proposes uniform increase in all rate elements. Proposes Tier III energy charges	Accepts creation of separate rate schedule and uniform increase in rate elements. Does not support proposed Tier III charges	Proposes rates to be aligned with class marginal costs of service.		<p>Opposed creation of Tier III for non-permanent residential customers and uniform rates for permanent and non-permanent residential customers in Tier II.</p> <p>Equal allocation of between non-permanent and permanent residential classes rather than 100 percent to non-permanent.</p>	Separate rates for residential non-permanent customers. Customer charge increased to \$12.00, consistent with PU Code. No Tier III charges.
<b>A-1 Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.	Proposes rates to be aligned with class marginal costs of service.			Rate elements aligned with the marginal cost of service.
<b>A-2 Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.	Proposes rates to be aligned with marginal costs of service.			Rate elements aligned with the marginal cost of service, while addressing bill impact concerns. Customer charge capped at 2x current Generation charges aligned to recover marginal generation costs.
<b>A-3 Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.	Proposes rates to be aligned with marginal costs of service.	Proposes wildfire costs to be recovered from customer and demand charges.		Wildfire costs to be recovered through demand charges. Remaining revenue increase recovered through a uniform % increase in rate elements.

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>PA, OLS, SL Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.				Uniform % increase in rate elements.
<b>CARE discount</b>	Proposes increase to 25.0 percent	Does not support increase in CARE discount				No changes in CARE discount.
<b>Time of use periods</b>	Proposes to continue current TOU Periods.	Proposes alignment of TOU periods with underlying marginal costs	Proposes alignment of TOU periods with underlying marginal costs		Liberty should utilize its Customer First data systems to provide better cost of service study to adopt a rate design that relies on factors such as usage amount and time period rather than customer class.	No changes in current TOU periods.
<b>DCFC rates</b>	Developed on a revenue neutral basis with only energy charges	Rejects Liberty's proposal citing multiple reasons. Proposes Liberty re-file DCFC rates with improved analysis	Supports development of DCFC rates to recover marginal costs.			DCFC rates to be developed to recover marginal costs.

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### MARGINAL COST STUDY

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Derivation of marginal generation capacity costs</b>	Proposes derivation based on a proxy natural gas combustion-turbine unit	Accepts Liberty's proposal.	Proposes utilizing MGCC based on battery storage resource including any reasonable estimates from other parties, or PG&E's recently approved MGCC	Accepts Liberty's proposal.		MGCC to be calculated based on PG&E's recently approved MGCC.
<b>Allocation of marginal generation capacity costs</b>	Proposes allocation based on POP 12CP method	Accepts Liberty's proposal.	Proposes allocation based on Winter system peak, and class contribution to system peak	Accepts Liberty's proposal.		Allocation based on POP 4CP method to align with winter system peak.
<b>Treatment of distribution demand non-substation costs</b>	Proposes 50% TOU-related and 50% non-TOU related	Accepts Liberty's proposal.	Proposes treatment of all distribution demand costs as 100% TOU related	Accepts Liberty's proposal.		Distribution demand non-substation costs to be treated as 50% TOU-related and 50% non-TOU related
<b>Allocation of TOU-related distribution demand costs</b>	Proposes allocation based on class usage in each TOU period	Accepts Liberty's proposal.	Proposes allocation based on Top 100 load hours	Accepts Liberty's proposal.		Allocation of TOU-related distribution demand costs to be based on Top 100 load hours
<b>Allocation of non-TOU-related distribution demand costs</b>	Proposes based on NCP demands and Transformer load study	Accepts Liberty's proposal.	Proposes treatment of all distribution demand costs as 100% TOU related. Proposes not utilizing Transformer Load study and NCP demands for allocation of distribution costs	Accepts Liberty's proposal.		Allocation of Non-TOU-related distribution demand costs to be based on NCP demands only

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Determination of new customer hook-ups</b>	Proposes based on 2011-2024 customer growth	Accepts Liberty's proposal.	Proposes based on regression slope for 2012-2024 number of customers	Accepts Liberty's proposal.	Proposes equal allocation of new customer hook up charges between non-permanent and permanent residential classes rather than 100 percent to non-permanent.	Residential new hook-ups to be considered 50% related to non-permanent customers, and 50% related to permanent customers. New hook-ups to be determined based on 2012-2024 regression slope.
<b>Determination of underground investment %</b>	Proposes based on prior study estimates.	Accepts Liberty's proposal.	Proposes determination based on updated data provided in Liberty's discovery response	Accepts Liberty's proposal.		Determination based on updated data provided in Liberty's discovery response
<b>Determination of A-1 and A-2 customers served from transformers</b>	Proposes based on prior study estimates	Accepts Liberty's proposal.	Proposes determination based on Company's Discovery Response	Accepts Liberty's proposal.		Determination based on updated data provided in Liberty's discovery response
<b>Determination of customer-related distribution O&amp;M</b>	Proposes determination based on customer-related % investments	Accepts Liberty's proposal.	Proposes determination based on 2016-2020 FERC Form 1 Data	Accepts Liberty's proposal.		Determination based on 2016-2020 FERC Form 1 Data

## **APPENDIX B**

### **DETAILS OF THE STIPULATED CAPITAL EXPENDITURES**

## Details of the stipulated Capital Expenditures<sup>7</sup>

### 1. Safety and Reliability – Distribution: Total - \$15,171,000

- a. Pole Replacements Per Test  
2021: \$470,000  
2022: \$483,000  
**Total: \$953,000**
- b. Overhead Failures/Services  
2021: \$1,692,000  
2022: \$1,738,000  
**Total: \$3,430,000**
- c. Underground Failures/Services  
2021: \$1,034,000  
2022: \$1,062,000  
**Total: \$2,096,000**
- d. Distribution Rebuilds – Overhead  
2021: \$2,296,000  
2022: \$2,500,000  
**Total: \$4,796,000**
- e. Distribution Rebuilds - Underground  
2021: \$361,000  
2022: \$1,500,000  
**Total: \$1,861,000**
- f. Submersible Transformer Replacement  
2021: \$500,000  
2022: \$5,000  
**Total: \$505,000**
- g. Claims  
2021: \$419,000  
2022: \$430,000  
**Total: \$849,000**

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<sup>7</sup> As noted in Section 4.11, fn. 5.

- h. Street and Highway Improvements  
2021: \$336,000  
2022: \$345,000  
**Total: \$681,000**
- 2. **Safety and Reliability – Substation: Total - \$11,337,000**
  - a. 625/650 Phase 2B  
2021: \$0  
2022: \$7,074,000  
**Total: \$7,074,000**
  - b. Portola Substation  
2021: \$0  
2022: \$0  
**Total: \$0**
  - c. Squaw Valley Substation  
2021: \$0  
2022: \$100,000  
**Total: \$100,000**
  - d. Squaw Valley/Tahoe City CBs  
2021: \$382,000  
2022: \$400,000  
**Total: \$782,000**
  - e. Stampede Substation  
2021: \$25,000  
2022: \$0  
**Total: \$25,000**
  - f. Stateline Substation  
2021: \$0  
2022: \$100,000  
**Total: \$100,000**
  - g. Cemetery Substation  
2021: \$0  
2022: \$0  
**Total: \$0**

- h. Prosser Substation  
2021: \$0  
2022: \$25,000  
**Total: \$25,000**
- i. Sierra Brooks Substation  
2021: \$0  
2022: \$0  
**Total: \$0**
- j. Tahoe City Substation  
2021: \$0  
2022: \$0  
**Total: \$0**
- k. Substation Fencing  
2021: \$561,000  
2022: \$50,000  
**Total: \$611,000**
- l. Emergency Substation Equipment Replacement  
2021: \$625,000  
2022: \$642,000  
**Total: \$1,267,000**
- m. Substation Spare Transformer  
2021: \$25,000  
2022: \$900,000  
**Total: \$925,000**
- n. Other Substation Capital  
2021: \$332,000  
2022: \$96,000  
**Total: \$428,000**
- 3. **Wildfire Mitigation – Covered Conductor: Total - \$21,686,000**
  - a. Tahoe City 7300  
2021: \$1,259,000  
2022: \$788,000  
**Total: \$2,047,000**



- b. Topaz 1261  
2021: \$300,000  
2022: \$500,000  
**Total: \$800,000**
- c. Meyers 3300  
2021: \$2,303,000  
2022: \$3,235,000  
**Total: \$5,538,000**
- d. Meyers 3400  
2021: \$4,990,000  
2022: \$3,000,000  
**Total: \$7,990,000**
- e. 640A Line  
2021: \$0  
2022: \$50,000  
**Total: \$50,000**
- f. 640B Line  
2021: \$0  
2022: \$100,000  
**Total: \$100,000**
- g. Brockway 5100  
2021: \$0  
2022: \$100,000  
**Total: \$100,000**
- h. Brockway 4202  
2021: \$644,000  
2022: \$293,000  
**Total: \$937,000**
- i. Stateline 2300  
2021: \$0  
2022: \$25,000  
**Total: \$25,000**
- j. Montreal Road

2021: \$0

2022: \$0

**Total: \$0**

k. Hobart 7700

2021: \$450,000

2022: \$3,649,000

**Total: \$4,099,000**

l. Future Projects

2021: \$0

2022: \$0

**Total: \$0**

4. **Wildfire Mitigation – Other: Total - \$15,940,000**

a. Pole Replacements

2021: \$4,500,000

2022: \$4,500,000

**Total: \$9,000,000**

b. Fuse Replacements

2021: \$867,000

2022: \$891,000

**Total: \$1,758,000**

c. Tree Attachments

2021: \$560,000

2022: \$573,000

**Total: \$1,133,000**

d. Wire Upgrades

2021: \$600,000

2022: \$350,000

**Total: \$950,000**

e. Auto Reclosers

2021: \$300,000

2022: \$360,000

**Total: \$660,000**

f. CALFire Exempt Hardware

2021: \$0

2022: \$500,000

**Total: \$500,000**

g. Substation Animal Guarding

2021: \$804,000

2022: \$300,000

**Total: \$1,104,000**

h. Emerging Technologies

2021: \$0

2022: \$0

**Total: \$0**

i. Weather Stations

2021: \$0

2022: \$135,000

**Total: \$135,000**

j. Distribution Fault Anticipation (“DFA”)

2021: \$0

2022: \$150,000

**Total: \$150,000**

k. High Impedance Fault Detection (“HIFD”)

2021: \$0

2022: \$100,000

**Total: \$100,000**

l. Light Detection and Ranging (“LiDAR”)

2021: \$400,000

2022: \$0

**Total: \$400,000**

m. Transportation and Equipment (“T&E”)

2021: \$50,000

2022: \$0

**Total: \$50,000**

5. **Customer Driven: Total - \$7,483,000**

a. New Business

2021: \$3,518,000

2022: \$3,615,000

**Total: \$7,133,000**

b. Rule 20A - Apache

2021: \$250,000

2022: \$0

**Total: \$250,000**

c. Rule 20A - National to Beach<sup>8</sup>

2021: \$0

2022: \$0

**Total: \$0**

d. Rule 20A - Johnson Boulevard

2021: \$0

2022: \$100,000

**Total: \$100,000**

e. Rule 20A - El Dorado County

2021: \$0

2022: \$0

**Total: \$0**

6. **Other Capital Projects: Total - \$17,026,000**

a. Information Technology

2021: \$870,000

2022: \$500,000

**Total: \$1,370,000**

b. Mobile Home Park Conversion (MHP)

2021: \$400,000

2022: \$0

**Total: \$400,000**

c. Fleet Replacements

2021: \$300,000

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<sup>8</sup> As described in Section 4.12.4., Liberty may request, in an advice letter, to recover Rule 20A – National to Beach project capital costs in rates once the project is completed.

- 2022: \$850,000  
**Total: \$1,150,000**
- d. Transportation Electrification  
2021: \$1,117,000  
2022: \$800,000  
**Total: \$1,917,000**
- e. Geographic Information System (“GIS”)  
2021: \$873,000  
2022: \$1,515,000  
**Total: \$2,388,000**
- f. North Lake Tahoe (“NLT”) Remodel  
2021: \$0  
2022: \$3,990,000  
**Total: \$3,990,000**
- g. South Lake Tahoe (“SLT”) Remodel  
2021: \$0  
2022: \$4,424,000  
**Total: \$4,424,000**
- h. Furniture Replacement  
2021: \$667,000  
2022: \$50,000  
**Total: \$717,000**
- i. Dunlap Building Improvements  
2021: \$120,000  
2022: \$0  
**Total: \$120,000**
- j. SLT Containment Building  
2021: \$0  
2022: \$300,000  
**Total: \$300,000**
- k. Portola Building Improvements  
2021: \$0  
2022: \$50,000

**Total: \$50,000**

l. SLT Fencing

2021: \$0

2022: \$200,000

**Total: \$200,000**

m. NLT Fencing

2021: \$0

2022: \$0

**Total: \$0**

n. SLT Covered Storage

2021: \$0

2022: \$0

**Total: \$0**

o. NLT Covered Storage

2021: \$0

2022: \$0

**Total: \$0**

p. Training Center

2021: \$0

2022: \$0

**Total: \$0**

q. Coleville Walker Warehouse

2021: \$0

2022: \$0

**Total: \$0**

## **ATTACHMENT B**

**ATTACHMENT 1**

**ALL-PARTY SETTLEMENT AGREEMENT ON MARGINAL COSTS, REVENUE  
ALLOCATION AND RATE DESIGN ISSUES BETWEEN LIBERTY UTILITIES  
(CALPECO ELECTRIC) LLC (U933-E), THE PUBLIC ADVOCATES OFFICE, THE  
A-3 CUSTOMER COALITION, THE SMALL BUSINESS UTILITY ADVOCATES AND  
THE TAHOE ENERGY RATEPAYERS GROUP**



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

Application of Liberty Utilities (CalPeco Electric) LLC (U 933-E) for Authority to Among Other Things, Increase Its Authorized Revenues for Electric Service, Update Its Energy Cost Adjustment Clause Billing Factors, Establish Marginal Costs, Allocate Revenues, And Design Rates, as of January 1, 2022.

A.21-05-017  
(Filed May 28, 2021)

**ALL-PARTY SETTLEMENT AGREEMENT ON MARGINAL COSTS, REVENUE  
ALLOCATION AND RATE DESIGN ISSUES BETWEEN LIBERTY UTILITIES  
(CALPECO ELECTRIC) LLC (U933-E), THE PUBLIC ADVOCATES OFFICE, THE  
A-3 CUSTOMER COALITION, THE SMALL BUSINESS UTILITY ADVOCATES AND  
THE TAHOE ENERGY RATEPAYERS GROUP**

**1. INTRODUCTION**

- 1.1. In accordance with Rule 12.1(a) of the Commission’s Rules of Practice and Procedure (“Rule”), the MC/RA/RD Settling Parties (as defined in Section 2 below) enter into this all-party marginal costs, revenue allocation and rate design settlement agreement (“MC/RA/RD Settlement”) for purposes of resolving all disputed marginal costs, revenue allocation and rate design issues in this proceeding.
- 1.2. The MC/RA/RD Settling Parties are filing a Joint Motion to Adopt the MC/RA/RD Settlement Agreement among Liberty Utilities (CalPeco Electric) LLC (U933E), the Public Advocates Office at the California Public Utilities Commission, the A-3 Customer Coalition, the Small Business Utility Advocates and the Tahoe Energy Ratepayers Group (“MC/RA/RD Settlement Approval Motion”) that sets forth the factual and legal bases of the MC/RA/RD Settlement; advises the Commission of its scope; and presents the grounds on which Commission approval and adoption are urged.
- 1.3. As the MC/RA/RD Settlement Approval Motion explains, the MC/RA/RD Settlement complies with Commission requirements for approval of settlements, because it is reasonable in light of the whole record, consistent with the law, and in the public interest. Accordingly, the MC/RA/RD Settling Parties respectfully request the Commission to adopt and approve this MC/RA/RD Settlement.
- 1.4. The MC/RA/RD Settling Parties are entering into this MC/RA/RD Settlement to avoid the expense and uncertainty of an evidentiary hearing and to expedite Commission approval of Liberty’s Test Year (“TY”) 2022 marginal costs,

revenue allocation and rate design issues consistent with this MC/RA/RD Settlement.

- 1.5. Since this MC/RA/RD Settlement represents a compromise by them, the MC/RA/RD Settling Parties have entered into each component of this MC/RA/RD Settlement on the basis that its approval by the Commission not be construed as an admission or concession by any MC/RA/RD Settling Party regarding any fact or matter of law in dispute in this proceeding or in any other proceeding before the Commission. Furthermore, the MC/RA/RD Settling Parties intend that the approval of this MC/RA/RD Settlement by the Commission not be construed as a precedent or statement of policy of any kind for or against any MC/RA/RD Settling Party in any current or future proceeding.
- 1.6. In this MC/RA/RD Settlement, the MC/RA/RD Settling Parties have resolved all issues related to Liberty's TY 2022 marginal costs, revenue allocation, and rate design issues.

## **2. DEFINITIONS**

- 2.1. The term "Liberty" means Liberty Utilities (CalPeco Electric) LLC (U 933-E), the Applicant in this proceeding.
- 2.2. The term "Cal Advocates" means the Public Advocates Office at the California Public Utilities Commission.
- 2.3. The term "A-3 CC" means the A-3 Customer Coalition.
- 2.4. The term "SBUA" means the Small Business Utility Advocates.
- 2.5. The term "Tahoe ERG" means the Tahoe Energy Ratepayers Group.
- 2.6. The term "MC/RA/RD Settling Parties" means collectively Liberty, Cal Advocates, A-3 CC, SBUA and TERG.
- 2.7. The term "GRC" means General Rate Case.
- 2.8. The term "O&M" means Operating & Maintenance.
- 2.9. The term "POP 4CP" means Probability of Peak of top 4 monthly coincident peak demands.
- 2.10. The term "kWh" means kilowatt hour.
- 2.11. The term "TOU" means time of use.
- 2.12. The term "kVA" means kilovolt-ampere.

## **3. EXHIBITS**

- 3.1. This MC/RA/RD Settlement is based on the MC/RA/RD Settling Parties' positions on marginal costs, revenue allocation and rate design stated in:
  - 3.1.1. Prepared Direct Testimony of Liberty, Exh. Liberty-12: Chapter 12: Marginal Cost and Rate Design (Tim Lyons and Talha Sheik), served on May 28, 2021.

- 3.1.2 Supplemental Prepared Direct Testimony of Liberty, Exh. Liberty-14: Rate Design (Tim Lyons), served on Sept. 10, 2021.
- 3.1.3 Prepared Rebuttal Testimony of Liberty, Exh. Liberty-20: Revenue Requirement and Other Matters (Cindy Fisher, Edward Jackson and Tim Lyons), served on March 23, 2022.
- 3.1.4 Prepared Rebuttal Testimony of Liberty, Exh. Liberty-22: Rate Design (Tim Lyons), served on March 23, 2022.
- 3.1.4 Prepared Direct Testimony of Cal Advocates, Exh. Cal Advocates-05: Customers and Sales Forecast, Cost Allocation and Rate Design (Maricela Sierra), served on February 23, 2022.<sup>1</sup>
- 3.1.5 Prepared Direct Testimony of A-3 CC, Exh. A-3-01: Prepared Testimony of Geoffrey B. Inge, served on February 23, 2022.
- 3.1.6 Prepared Rebuttal Testimony of A-3 CC, Exh. A-3-02: Prepared Rebuttal Testimony of Geoffrey B. Inge, served on March 23, 2022.
- 3.1.7 Prepared Direct Testimony of SBUA, Exh. SBUA-01: Testimony of Paul L. Chernick and John D. Wilson, served on February 23, 2022.
- 3.1.8 Prepared Rebuttal Testimony of SBUA, Exh. SBUA-02: Rebuttal Testimony of Paul L. Chernick and John D. Wilson, served on March 23, 2022.
- 3.1.9 Prepared Direct Testimony of Tahoe ERG, Exh. Tahoe-01: Testimony of James D. Wood, served on February 23, 2022.
- 3.1.10 Prepared Direct Testimony of Tahoe ERG, Exh. Tahoe-02: Testimony of Karen L. Miller, served on February 23, 2022.<sup>2</sup>

#### **4. TERMS AND CONDITIONS REGARDING MARGINAL COSTS, REVENUE ALLOCATION AND RATE DESIGN**

- 4.1. This section describes the stipulated model, forecasts, and amounts for Liberty's Test Year ("TY") 2022 GRC marginal costs, revenue allocation and rate design resolved by this MC/RA/RD Settlement.
- 4.2. Appendix A to this MC/RA/RD Settlement provides a comprehensive, Consolidated Comparison Exhibit of all participating parties' original and settled positions for all contested issues resolved by this MC/RA/RD Settlement as well as the separate, previously submitted All-Party Revenue Requirement Settlement

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<sup>1</sup> Cal Advocates did not prepare or serve any rebuttal testimony.

<sup>2</sup> Tahoe ERG did not prepare or serve any rebuttal testimony.

Agreement.<sup>3,4</sup> The Consolidated Comparison Exhibit of the MC/RA/RD Settling Parties' original proposals on marginal costs, revenue allocation and rate design that have been resolved by this MC/RA/RD Settlement can be found on pp.10-15 of Appendix A. In the event of a conflict between the terms of this MC/RA/RD Settlement and Appendix A, the terms of this MC/RA/RD Settlement shall control.

- 4.3. Appendix B to this MC/RA/RD Settlement provides a summary of the class average rates on a per kWh basis that will result from the Commission's adoption of this MC/RA/RD Settlement and the separate, previously submitted All-Party Revenue Requirement Settlement Agreement and Liberty's proposed Return on Equity ("ROE") of 10.5%.<sup>5</sup> Liberty will adjust the class average rate summaries to reflect Liberty's authorized TY 2022 revenue requirement in accordance with the provisions of this MC/RA/RD Settlement when rates are first implemented.
- 4.4. **Marginal Costs:** Appendix C to this MC/RA/RD Settlement provides marginal cost of service calculations and results that will result from the Commission's adoption of this MC/RA/RD Settlement, the separate, previously submitted All-Party Revenue Requirement Settlement Agreement and Liberty's proposed Return on Equity of 10.5%.
  - 4.4.1. This MC/RA/RD Settlement does not reflect approval or acceptance of any of the MC/RA/RD Settling Parties' marginal cost proposals. The MC/RA/RD Settling Parties agree that it is reasonable to use the marginal costs set forth in this Section 4.4 with the collar restrictions described in Section 4.5.3 on the revenue allocation results.
  - 4.4.2. **Marginal Generation Energy Costs:** calculated as follows using Liberty's 2021-2025 forecasted energy costs in Liberty's most recent Integrated Resource Plan. The marginal generation energy costs were assigned to each rate class based on their projected kWh sales.
    - 4.4.2.1. Winter TOU – Peak: \$31.51/kWh

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<sup>3</sup> *Joint Motion Of Liberty Utilities (CalPeco Electric) LLC (U-933-E), The Public Advocates Office At The California Public Utilities Commission, The A-3 Customer Coalition, The Small Business Utility Advocates And The Tahoe Energy Ratepayers Group For Adoption of the All-Party Settlement Agreement on Revenue Requirement Issues*, filed July 28, 2022.

<sup>4</sup> Note: the Consolidated Comparison Exhibit in Appendix A to this MC/RA/RD Settlement is a slightly updated version of the Consolidated Comparison Exhibit that supersedes the version attached as Appendix A to the separate, previously submitted All-Party Settlement Agreement on Revenue Requirement Issues. The updated version fixes a minor error that does not alter or impact any of the terms of the All-Party Revenue Requirement Settlement. The Consolidated Comparison Exhibit in Appendix A to this MC/RA/RD Settlement should, therefore, be used for all final Commission decisions in this proceeding.

<sup>5</sup> Liberty's proposed ROE was the only revenue requirement issue not resolved in the previously submitted All-Party Revenue Requirement Settlement Agreement. The parties to the All-Party Revenue Requirement Settlement Agreement agreed that Liberty's ROE should be determined by the Commission following the submission of briefs on that issue.

- 4.4.2.2. Winter TOU – Mid-Peak: \$15.66/kWh
- 4.4.2.3. Winter TOU – Off-Peak: \$31.57/kWh
- 4.4.2.4. Summer TOU - Peak: \$19.30/kWh
- 4.4.2.5. Summer TOU – Off-Peak: \$25.70/kWh
- 4.4.3. **Marginal Generation Capacity Cost (“MGCC”):** \$84.16/kW.  
Calculation based on Pacific Gas and Electric Company’s (“PG&E”) most recently approved MGCC and allocated as follows based on POP 4CP method to align with winter system peak:
  - 4.4.3.1. Winter TOU – Peak: \$47.74/kW
  - 4.4.3.2. Winter TOU – Mid-Peak: \$28.81/kW
  - 4.4.3.3. Winter TOU – Off-Peak: \$7.60/kW
- 4.4.4. **Marginal Distribution Demand Substation Costs:** \$83.30/kW.  
Calculation based on the relative increase in substation investments and peak demands based on historical and forecast data from 2000-2024 and 100% TOU-related.
- 4.4.5. **Marginal Distribution Demand Non-Revenue Costs:** Calculation based on 50% TOU-related and 50% non-TOU-related.
  - 4.4.5.1. Allocation of TOU-Related Marginal Distribution Demand Costs: \$447.51/kW. Calculated based on Top 100 load hours.
  - 4.4.5.2. Allocation of Non-TOU-Related Marginal Distribution Demand Costs: \$394.73/kW. Calculated based on NCP demands only.
- 4.4.6. **Marginal Distribution Customer Costs:**
  - 4.4.6.1. Residential New Customer Hook-Ups calculated based on regression slope for 2012-2024 number of customers with residential customer growth allocated 50% to Permanent residential customers and 50% to Non-Permanent residential customers.
  - 4.4.6.2. Underground Investment Percentages calculated based on the number of total underground transformers and the estimated number of customers each respective transformer serves:
    - 4.4.6.2.1. Residential Permanent: 35.0%
    - 4.4.6.2.2. Residential Non-Permanent: 35.0%
    - 4.4.6.2.3. Sub-Metered (“S-M”) Master Residential: 35.0%
    - 4.4.6.2.4. Small Commercial: 55.0%
    - 4.4.6.2.5. Medium Commercial: 60.0%
    - 4.4.6.2.6. Large Commercial: 75.0%
    - 4.4.6.2.7. Irrigation: 0.0%

4.4.6.3. A-1 and A-2 Customers Served from Transformers calculated based on the number of total underground transformers and the number of customers served by each type of service:

4.4.6.3.1. Class A-1, Underground

4.4.6.3.1.1. Single Phase (50 kVA): 4

4.4.6.3.1.2. Three Phase (75 kVA): 4

4.4.6.3.1.3. Three Phase (300 kVA): 10

4.4.6.3.2. Class A-1, Overhead

4.4.6.3.2.1. Single Phase (50 kVA): 3.5

4.4.6.3.2.2. Three Phase (3 x 25 kVA): 11

4.4.6.3.3. Class A-2, Underground: 1.25

4.4.6.3.4. Class A-2, Overhead: 2

4.4.6.4. Customer-Related Distribution O&M Costs updated using inflation-adjusted 2016-2020 costs from data in Liberty's 2016-2020 FERC Form 1 filings and weighted based on the customer-related unit investments per customer resulting from the preceding updates.

#### 4.5. **Revenue Allocation**

4.5.1. Appendix D to this MC/RA/RD Settlement provides a summary of the revenue allocation that will result from the Commission's adoption of this MC/RA/RD Settlement, the separate, previously submitted All-Party Revenue Requirement Settlement Agreement and Liberty's proposed Return on Equity of 10.5%.

4.5.2. This MC/RA/RD Settlement does not reflect approval or acceptance of any of the MC/RA/RD Settling Parties' revenue allocation proposals. The MC/RA/RD Settling Parties agree that the revenue allocation results set forth in Appendix D of this MC/RA/RD Settlement are reasonable.

4.5.3. **Collar Restrictions:** in order to mitigate rate increases and to promote rate stability, the MC/RA/RD Settling Parties agree to employ the following "collar restrictions" on revenue changes (excluding wildfire costs) for all customer classes:

4.5.3.1. The maximum revenue increase (excluding wildfire costs) for any customer class ("cap") is 39.80% (calculated as 75.0% of overall increase).<sup>6</sup>

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<sup>6</sup> If the overall increase is revised as a result of the Commission's decision on Liberty's Return on Equity, as specified in footnote 4, then the maximum and minimum revenue increases will be recalculated.

- 4.5.3.2. The minimum revenue increase (excluding wildfire costs) for any customer class (“floor”) is 19.44% (calculated as 14.5% of overall increase).
- 4.5.3.3. Except unless otherwise specified, any revenue amount that would constitute an under-collection or over-collection of Liberty’s revenues from a particular rate class resulting from the collar restrictions will be allocated to the rate classes that are within the cap-collar restrictions.
- 4.5.4. **Wildfire Mitigation Costs:** after the collaring restrictions have been applied, Liberty’s wildfire mitigation costs will be allocated to the rate groups based on allocation factors agreed to by the MC/RA/RD Settling Parties.
  - 4.5.4.1. Wildfire mitigation costs will be recovered through rate elements and not through separate fixed charges.
- 4.6. **Time of Use Periods:** Liberty will continue to use its current TOU periods.
- 4.7. **Rate Design:** Appendix E to this MC/RA/RD Settlement provides rate design calculations and results that will result from the Commission’s adoption of this MC/RA/RD Settlement, the separate, previously submitted All-Party Revenue Requirement Settlement Agreement, and Liberty’s proposed Return on Equity of 10.5%.
  - 4.7.1. This MC/RA/RD Settlement does not reflect approval or acceptance of any of the MC/RA/RD Settling Parties’ rate design proposals. The MC/RA/RD Settling Parties agree that the rate design elements and results described below are reasonable.
  - 4.7.2. **Residential Rate Design**
    - 4.7.2.1. **General Provisions**
      - 4.7.2.1.1. Tier 3 rates for Permanent and Non-Permanent customer classes are eliminated.
      - 4.7.2.1.2. Tier 2 rates (including the rate cap) for the Non-Permanent customer class are to be set to recover the class target revenues.
      - 4.7.2.1.3. Non-Permanent residential customers do not get a baseline allocation.
      - 4.7.2.1.4. New hook up costs will be allocated 50/50 between the Permanent and Non-Permanent residential customer classes.
      - 4.7.2.1.5. Liberty will adopt Tahoe ERG's definition for classifying Permanent residential customers for



account holders who self-declare/attest that they, or someone they authorize, will live in the home for a cumulative 183 days (6 months + 1 day) per year and do not have any electric service from another California electric utility where they receive any baseline allocation.

- 4.7.2.1.6. Liberty will revise its tariff to incorporate the above definition of Permanent residential customers.
- 4.7.2.1.7. Liberty will update scripts to be used by customer service representatives that will be uniformly used to determine whether a residential customer is properly classified as Permanent or Non-Permanent. The appropriate scripts would reflect the updated definitions found in Liberty's tariff.
- 4.7.2.1.8. Liberty commits to provide annual outreach to residential customers regarding California Alternate Rates for Energy ("CARE") and other low-income programs and include information about how to verify and potentially switch to the correct residential classification. This outreach will include an explanation of any rate difference between Permanent and Non-Permanent residential classes.
- 4.7.2.1.9. As elements of Liberty's "Customer First" data systems become operational over time, Liberty will develop means to assess various customers' classifications for determining whether they are classed appropriately and collect data for future GRCs regarding related marginal costs of service.
- 4.7.2.1.10. Liberty agrees that Commission approval of the settlement on rate design does not constitute a determination that Liberty will be relieved from its burden of justifying all aspects of any future rate design proposals including the continuation of the Permanent/Non-Permanent residential classification in future rate cases.
- 4.7.2.1.11. Tahoe ERG reserves its right to seek the elimination of the Non-Permanent customer class in future proceedings (rate case or otherwise).
- 4.7.2.1.12. Liberty aspires to utilize its Customer First data systems to provide better cost of service study to



adopt a rate design that relies on factors such as usage amount and time period rather than customer class.

- 4.7.2.1.13. Liberty agrees to meet with Tahoe ERG to discuss which workpapers and notes, incorporating information for which Liberty has asserted confidential status, might be retained by Tahoe ERG for internal analysis purposes in order to evaluate Liberty's positions in future rate cases.

#### 4.7.2.2. Permanent Residential

- 4.7.2.2.1. Monthly Customer charge: \$12.00 (increase consistent with allowed residential customer charge pursuant to Pub. Util. Code section 739.9).
- 4.7.2.2.2. Generation charge will recover generation-related costs calculated in the marginal cost study.
- 4.7.2.2.3. Distribution charges will recover distribution-related costs calculated in the marginal cost study, adjusted to reflect the collar mechanism.
- 4.7.2.2.4. The resulting average Permanent Residential base rate (calculated as total base revenues/kWh sales) is \$0.1575/kWh.<sup>7</sup>

#### 4.7.2.3. Permanent Residential CARE

- 4.7.2.3.1. CARE Discount: continue current twenty (20) percent discount and allocation of CARE discount costs.
- 4.7.2.3.2. Monthly CARE Customer charge: \$9.60
- 4.7.2.3.3. Generation charge will recover generation-related costs calculated in the marginal cost study.
- 4.7.2.3.4. Distribution charges will recover distribution-related costs calculated in the marginal cost study, adjusted to reflect the collar mechanism

#### 4.7.2.4. Non-Permanent Residential

- 4.7.2.4.1. Monthly Customer charge: \$12.00 (increase consistent with allowed residential customer charge pursuant to Pub. Util. Code section 739.9).

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<sup>7</sup> Presuming this MC/RA/RD Settlement, the separate, previously submitted All-Party Revenue Requirement Settlement Agreement and Liberty's proposed ROE of 10.5% are approved. There was no settlement of the ROE issue, and these average rates are based on Liberty's proposal which includes a higher ROE than Cal Advocates' proposal. Thus the average rates set forth represent a ceiling. If Cal Advocates' ROE proposal is adopted, these average rates will be adjusted accordingly.

- 4.7.2.4.2. Generation charge will recover generation-related costs calculated in the marginal cost study.
- 4.7.2.4.3. Distribution charges will recover distribution-related costs calculated in the marginal cost study, adjusted to reflect the collar mechanism.
- 4.7.2.4.4. The resulting average Non-Permanent Residential base rate (calculated as total base revenues/kWh sales) is \$0.1714/kWh.<sup>8</sup>

#### 4.7.3. **A-1 Rate Design**

- 4.7.3.1. Monthly Customer charge: \$23.63.
- 4.7.3.2. Generation charge will recover generation-related costs calculated in the marginal cost study.
- 4.7.3.3. Distribution charges will recover distribution-related costs, reflecting any other costs or adjustments, and adjusted to reflect the collar mechanism.

#### 4.7.4. **A-2 Rate Design**

- 4.7.4.1. Monthly Customer charge: \$87.56. Set at two times the current customer charge.
  - 4.7.4.1.1. Remaining customer costs (above \$87.56) will be recovered in the summer and winter distribution energy charges.
- 4.7.4.2. Generation charge will recover the generation-related costs calculated in the marginal cost study
- 4.7.4.3. Generation demand charges will recover demand-related costs.
  - 4.7.4.3.1. Shift recovery from summer demand charge to winter demand charge consistent with 4CP allocations.
- 4.7.4.4. Distribution charge will recover the distribution-related costs plus the remaining customer-related costs, reflecting any other costs or adjustments, and adjusted to reflect the collar mechanism.
- 4.7.4.5. Distribution demand charges will recover grid-related costs (rather than TOU costs).
  - 4.7.4.5.1. Grid-related costs will be recovered through both winter and summer demand charges (rather than only winter demand charge).
- 4.7.4.6. Distribution TOU-related costs will be recovered in energy charges.

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<sup>8</sup> Id.

#### 4.7.5. **A-3 Rate Design**

- 4.7.5.1. Monthly Customer charge: \$722.91
- 4.7.5.2. Generation charge will recover generation-related costs calculated in the marginal cost study.
- 4.7.5.3. Distribution charges will recover distribution-related costs calculated in the marginal cost study, adjusted to reflect the collar mechanism.

#### 4.7.6. **Irrigation (PA) Rate Design**

- 4.7.6.1. Monthly Customer charge: \$23.86
- 4.7.6.2. Generation and distribution charges will recover generation and distribution-related costs calculated in the marginal cost study, adjusted to reflect the collar mechanism.

#### 4.7.7. **Outdoor Lighting (OL) Rate Design**

- 4.7.7.1. Generation and distribution charges will recover generation and distribution-related costs calculated in the marginal cost study, adjusted to reflect the collar mechanism.

#### 4.7.8. **Street Lighting (SL) Rate Design**

- 4.7.8.1. Generation and distribution charges will recover generation and distribution-related costs calculated in the marginal cost study, adjusted to reflect the collar mechanism.

- 4.8. **Direct Current Fast Charging (“DCFC”) Rates**: will be developed to recover marginal costs.

## 5. **Other Terms and Conditions**

- 5.1. ***Commission’s Primary Jurisdiction.*** The MC/RA/RD Settling Parties agree that the Commission has primary jurisdiction over any interpretation, enforcement, or remedies regarding this MC/RA/RD Settlement. None of the MC/RA/RD Settling Parties may bring an action regarding this MC/RA/RD Settlement in any court or before another administrative agency without having first exhausted its administrative remedies at the Commission.
- 5.2. ***Further Actions.*** The MC/RA/RD Settling Parties acknowledge that this MC/RA/RD Settlement is subject to approval by the Commission. As soon as practicable after all the MC/RA/RD Settling Parties have signed the MC/RA/RD Settlement, the MC/RA/RD Settling Parties through their respective attorneys will prepare and file the MC/RA/RD Settlement Approval Motion. The MC/RA/RD Settling Parties will furnish such additional information, documents, or testimonies as the Commission may require for purposes of granting the MC/RA/RD Settlement Approval Motion and approving and adopting the MC/RA/RD Settlement.

- 5.3. **No Personal Liability.** None of the MC/RA/RD Settling Parties, or their respective employees, attorneys, or any other individual representative or agent, assumes any personal liability as a result of the MC/RA/RD Settling Parties signing this MC/RA/RD Settlement.
- 5.4. **Non-Severability.** The provisions of this MC/RA/RD Settlement are non-severable. If any of the MC/RA/RD Settling Parties fails to perform its respective obligations under this MC/RA/RD Settlement, the MC/RA/RD Settlement will be regarded as rescinded.
- 5.5. **Voluntary and Knowing Acceptance.** Each MC/RA/RD Settling Party hereto acknowledges and stipulates that it is agreeing to this MC/RA/RD Settlement freely, voluntarily, and without any fraud, duress, or undue influence by any other MC/RA/RD Settling Party. Each MC/RA/RD Settling Party has read and fully understands its rights, privileges, and duties under this MC/RA/RD Settlement, including its right to discuss this MC/RA/RD Settlement with its legal counsel, which has been exercised to the extent deemed necessary.
- 5.6. **No Modification.** This MC/RA/RD Settlement constitutes the entire settlement among the MC/RA/RD Settling Parties regarding the matters set forth herein, which may not be altered, amended, or modified in any respect except in writing and with the express written and signed consent of all the MC/RA/RD Settling Parties hereto.
- 5.7. **No Reliance.** None of the MC/RA/RD Settling Parties has relied or presently relies on any statement, promise, or representation by any other MC/RA/RD Settling Party, whether oral or written, except as specifically set forth in this MC/RA/RD Settlement. Each MC/RA/RD Settling Party expressly assumes the risk of any mistake of law or fact made by such MC/RA/RD Settling Party or its authorized representative.
- 5.8. **Counterparts.** This MC/RA/RD Settlement may be executed in separate counterparts by the different MC/RA/RD Settling Parties hereto and all so executed will be binding and have the same effect as if all the MC/RA/RD Settling Parties had signed one and the same document. All such counterparts will be deemed to be an original and together constitute one and the same MC/RA/RD Settlement, notwithstanding that the signatures of all the MC/RA/RD Settling Parties and/or of a MC/RA/RD Settling Party's attorney or other representative do not appear on the same page of this MC/RA/RD Settlement or the related MC/RA/RD Settlement Approval Motion.
- 5.9. **Binding upon Full Execution.** This MC/RA/RD Settlement will become effective and binding on each of the MC/RA/RD Settling Parties as of the date when it is fully executed. It will also be binding upon each of the MC/RA/RD Settling Parties' respective successors, subsidiaries and affiliates, whether past, present or future.
- 5.10. **Commission Adoption Not Precedential.** In accordance with Rule 12.5, the MC/RA/RD Settling Parties agree and acknowledge that unless the Commission expressly provides otherwise, the Commission's adoption of this MC/RA/RD

Settlement does not constitute approval of or precedent regarding any principle or issue of law or fact in this or any other current or future proceeding.

- 5.11. **Enforceability.** The MC/RA/RD Settling Parties agree and acknowledge that after issuance of a Commission decision approving and adopting this MC/RA/RD Settlement, the Commission may reassert jurisdiction and reopen this proceeding to enforce the terms and conditions of this MC/RA/RD Settlement.
- 5.12. **Finality.** Once fully executed by the MC/RA/RD Settling Parties and adopted and approved by a Commission decision, this MC/RA/RD Settlement fully and finally settles any and all disputes regarding the issues described in this MC/RA/RD Settlement between the MC/RA/RD Settling Parties in this proceeding, unless otherwise specifically provided in the MC/RA/RD Settlement.
- 5.13. **No Admission.** Nothing in this MC/RA/RD Settlement or related negotiations may be construed as an admission of any law or fact by any of the MC/RA/RD Settling Parties, or as precedential or binding on any of the MC/RA/RD Settling Parties in any other proceeding, whether before the Commission, in any court, or in any other state or federal administrative agency. Further, unless expressly stated herein this MC/RA/RD Settlement does not constitute an acknowledgement, admission, or acceptance by any of the MC/RA/RD Settling Parties regarding any issue of law or fact in this matter, or the validity or invalidity of any particular method, theory, or principle of ratemaking or regulation in this or any other proceeding.
- 5.14. **Authority to Sign.** Each MC/RA/RD Settling Party who executes this MC/RA/RD Settlement represents and warrants to each other MC/RA/RD Settling Party that the individual signing this MC/RA/RD Settlement and the related MC/RA/RD Settlement Approval Motion has the legal authority to do so on behalf of the MC/RA/RD Settling Party.
- 5.15. **Limited Admissibility.** Each MC/RA/RD Settling Party signing this MC/RA/RD Settlement agrees and acknowledges that this MC/RA/RD Settlement will be admissible in any subsequent Commission proceeding for the sole purpose of enforcing the Terms and Conditions of this MC/RA/RD Settlement.
- 5.16. **Estoppel or Waiver.** Unless expressly stated herein, the MC/RA/RD Settling Parties' execution of this MC/RA/RD Settlement is not intended to provide any of the MC/RA/RD Settling Parties in any manner a basis of estoppel or waiver in this or any other proceeding.
- 5.17. **Rescission.** If the Commission, any court, or any other state or federal administrative agency, rejects or materially alters any provision of the MC/RA/RD Settlement, it will be deemed rescinded by the MC/RA/RD Settling Parties and of no legal effect as of the date of issuance of the Commission decision or final ruling, decision, or modification by any court or any other state or federal administrative agency, rejecting or materially altering the MC/RA/RD Settlement. The MC/RA/RD Settling Parties may negotiate in good faith regarding whether they want to accept the changes by the Commission, any court,

or any other state or federal administrative agency, and resubmit a revised MC/RA/RD Settlement to the Commission.

## **6. Conclusion**

- 6.1. Each of the MC/RA/RD Settling Parties has executed this MC/RA/RD Settlement as of the date appearing below their respective signatures.

[SIGNATURE PAGES FOLLOW NEXT]

**PUBLIC ADVOCATES OFFICE AT THE  
CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

*Edward Jackson*

---

Linda Serizawa  
Deputy Director  
Dated: \_\_\_\_\_

---

Edward Jackson  
President (California)  
Dated: August 17, 2021

**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

---

Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: \_\_\_\_\_

---

Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**

---

Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: \_\_\_\_\_

**PUBLIC ADVOCATES OFFICE AT THE  
CALIFORNIA PUBLIC UTILITIES  
COMMISSION**



Linda Serizawa

Deputy Director

Dated: August 17, 2022

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

Edward Jackson

President (California)

Dated: \_\_\_\_\_

**A-3 CUSTOMER COALITION**

Brian Cragg

Attorney for A-3 Customer Coalition

Dated: \_\_\_\_\_

**SMALL BUSINESS UTILITY  
ADVOCATES**

Jennifer Weberski

Attorney for Small Business Utility Advocates

Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**

Anita Taff-Rice

Attorney for Tahoe Energy Ratepayers Group

Dated: \_\_\_\_\_



**PUBLIC ADVOCATES OFFICE AT THE  
CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

---

Linda Serizawa  
Deputy Director  
Dated: \_\_\_\_\_

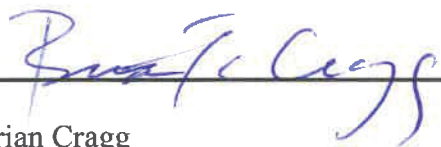
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Edward Jackson  
President (California)  
Dated: \_\_\_\_\_

**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

---



Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: Aug. 17, 2022

---

Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**

---

Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: \_\_\_\_\_

**PUBLIC ADVOCATES OFFICE AT THE  
CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

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Linda Serizawa  
Deputy Director  
Dated: \_\_\_\_\_

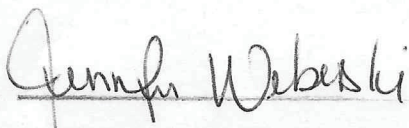
Edward Jackson  
President (California)  
Dated: \_\_\_\_\_

**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

---

Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: \_\_\_\_\_



Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: 8/18/22

**TAHOE ENERGY RATEPAYERS GROUP**

---

Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: \_\_\_\_\_

**PUBLIC ADVOCATES OFFICE AT THE  
CALIFORNIA PUBLIC UTILITIES  
COMMISSION**

**LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC**

---

Linda Serizawa  
Deputy Director  
Dated: \_\_\_\_\_

---

Edward Jackson  
President (California)  
Dated: \_\_\_\_\_

**A-3 CUSTOMER COALITION**

**SMALL BUSINESS UTILITY  
ADVOCATES**

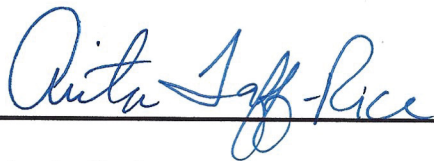
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Brian Cragg  
Attorney for A-3 Customer Coalition  
Dated: \_\_\_\_\_

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Jennifer Weberski  
Attorney for Small Business Utility Advocates  
Dated: \_\_\_\_\_

**TAHOE ENERGY RATEPAYERS GROUP**



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Anita Taff-Rice  
Attorney for Tahoe Energy Ratepayers Group  
Dated: 8/21/22

**APPENDIX A**

**CONSOLIDATED COMPARISON EXHIBIT**

**Comparison of Original Party Positions on All Settled Issues**

# CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

## REVENUE REQUIREMENT

Capital (2021-2022)  
\$(000)

	Liberty			Cal Advocates			Settled Position		
	2021	2022	Total	2021	2022	Total	2021	2022	Total
<b>Distribution</b>									
Pole Replacements Per Test	663	681	1,343	470	483	953	470	483	953
Overhead Failures/Services	1,692	1,738	3,430	1,692	1,738	3,430	1,692	1,738	3,430
Underground Failures/Services	1,034	1,062	2,096	1,034	1,062	2,096	1,034	1,062	2,096
Distribution Rebuilds – OH	3,224	3,313	6,536	2,296	2,360	4,656	2,296	2,500	4,796
Distribution Rebuilds – UG	2,192	1,468	3,660	243	728	971	361	1,500	1,861
Submersible Transformer Replace	500	5	505	500	5	505	500	5	505
Claims	419	430	849	122	126	248	419	430	849
Street & Highway Improvements	336	345	681	336	345	681	336	345	681
<b>Total Distribution</b>	10,058	9,042	19,100	6,693	6,847	13,540	7,108	8,063	15,171
<b>Substation</b>									
625/650 Phase 2B	7,074	-	7,074	7,074	-	7,074	-	7,074	7,074
Portola Substation	500	5,500	6,000	-	-	-	-	-	-
Squaw Valley Substation	-	100	100	-	100	100	-	100	100
Squaw Valley/Tahoe City CBs	382	400	782	382	400	782	382	400	782
Stampede Substation	25	1,450	1,475	-	-	-	25	-	25
Stateline Substation	-	100	100	-	100	100	-	100	100
Prosser Substation	0	25	25	-	25	25	-	25	25
Substation Fencing	561	50	611	561	50	611	561	50	611
Emergency Substation Equipment	625	642	1,267	625	642	1,267	625	642	1,267
Substation Spare Transformer	25	900	925	25	900	925	25	900	925
Other Substation Capital	332	96	428	332	96	428	332	96	428
<b>Total Substation</b>	9,523	9,263	18,786	8,999	2,313	11,312	1,950	9,387	11,337

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

	Liberty			Cal Advocates			Settled Position		
	2021	2022	Total	2021	2022	Total	2021	2022	Total
<b>WMP Covered Conductor</b>									
Tahoe City 7300	1,259	788	2,047	1,259	788	2,047	1,259	788	2,047
Topaz 1261	1,461	-	1,461	300	-	300	300	500	800
Meyers 3300	2,303	3,235	5,538	2,303	3,235	5,538	2,303	3,235	5,538
Meyers 3400	9,480	2,000	11,480	3,800	820	4,620	4,990	3,000	7,990
640A Line	50	3,465	3,515	-	-	-	-	50	50
640B Line	50	50	100	-	-	-	-	100	100
Brockway 5100	-	100	100	-	-	-	-	100	100
Brockway 4202	937	-	937	-	-	-	644	293	937
Stateline 2300	25	558	583	-	-	-	-	25	25
Hobart 7700	4,099	-	4,099	-	-	-	450	3,649	4,099
<b>Total WMP Covered Conductor</b>	19,664	10,196	29,860	7,662	4,843	12,505	9,946	11,740	21,686
<b>WMP Other</b>									
Pole Replacements	10,500	2,500	13,000	4,500	2,500	7,000	4,500	4,500	9,000
Fuse Replacements	867	891	1,758	60	63	123	867	891	1,758
Tree Attachments	664	682	1,346	560	573	1,133	560	573	1,133
Wire Upgrades	600	350	950	10	10	20	600	350	950
Auto Reclosers	300	360	660	110	134	244	300	360	660
CALFire Exempt Hardware	-	500	500	-	500	500	-	500	500
Substation Animal Guarding	804	804	1,608	-	-	-	804	300	1,104
Emerging Technologies	200	200	400	-	-	-	-	-	-
Weather Stations	120	15	135	-	-	-	--	135	135
DFA	50	100	150	-	-	-	-	150	150
HIFD	-	100	100	-	100	100	-	100	100
LiDAR	400	-	400	2	-	2	400	-	400
T&E	98	-	98	50	-	50	50	-	50
<b>Total WMP Other</b>	14,603	6,502	21,104	5,292	3,880	9,172	8,081	7,859	15,940

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

	Liberty			Cal Advocates			Settled Position		
	2021	2022	Total	2021	2022	Total	2021	2022	Total
<b>Customer-Driven</b>									
New Business	3,518	3,615	7,133	3,518	3,615	7,133	3,518	3,615	7,133
Rule 20A – Apache	250	-	250	250	-	250	250	-	250
Rule 20A – National to Beach	1,095	6,154	7,250	350	1,970	2,320	-	-	-
Rule 20A – Johnson Boulevard	100	600	700	-	-	-	-	100	100
<b>Total Customer-Driven</b>	4,964	10,369	15,333	4,118	5,585	9,703	3,768	3,715	7,483
<b>Other Capital Projects</b>									
Information Technology	870	806	1,676	466	436	902	870	500	1,370
MHP Conversions	400	-	400	186	0	186	400	-	400
Fleet Replacements	300	1,850	2,150	10	56	66	300	850	1,150
Transportation Electrification	1,117	1,888	3,004	142	246	388	1,117	800	1,917
GIS	873	1,515	2,388	-	-	-	873	1,515	2,388
Building Remodels/Renovations	9,202	700	9,902	30	550	580	787	9,014	9,801
<b>Total Other Capital Projects</b>	12,762	6,760	19,521	834	1,288	2,122	4,347	12,679	17,026
<b>GRAND TOTAL</b>	71,573	52,132	123,705	33,598	24,756	58,354	35,200	53,443	88,643

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Capital (2023-2024) PTAM \$(000)

Issue	Liberty	Cal Advocates	Settled Position
Safety and Reliability – Distribution	18,402	14,149	15,000
Safety and Reliability – Substation	18,772	15,970	17,000
WMP – Covered Conductor	24,052	6,454	17,000
WMP – Other	11,157	7,714	10,000
Customer Driven	12,013	1,307	-
Other Capital Projects	14,810	2,828	5,000
<b>GRAND TOTAL</b>	<b>99,205</b>	<b>48,422</b>	<b>64,000</b>

### Treatment of Other Capital Projects

Issue	Liberty	Cal Advocates	Settled Position
<b>Customer First</b>	Liberty proposed recovery via a Tier 2 Advice Letter once the Customer First project is considered used and useful.	Cal Advocates opposed Liberty's request associated with the Customer First project based on the following: 1) the projected costs and benefits allocated to Liberty are unsupported; 2) the total forecasted costs allocated to Liberty over the lifetime of the project is substantially higher than its projected savings, and 3) Liberty's ratepayers alone should not absorb all the costs associated with the Customer First project.	Liberty to recover costs via a Tier 2 Advice Letter once the project is considered used and useful.
<b>AMI</b>	Liberty proposed recovery via a Tier 2 Advice Letter once the AMI project is considered used and useful.	No opposition to AMI project, project costs, or recovery mechanism.	Liberty to recover costs via a Tier 2 Advice Letter once the project is considered used and useful.
<b>Rule 20A – National to Beach</b>	Liberty included this project in its capital forecast and proposed recovery in rates for 2021-2022 costs and PTAM recovery for 2023 costs.	Proposed reduced cost forecast for this project and opposed PTAM recovery eligibility for 2023 costs.	Liberty to recover costs via a Tier 2 Advice Letter once the project is considered used and useful.



## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### O&M and A&G Expenses \$(000)

Account	Description	Liberty	Cal Advocates	Settled Position
	<b>Other Power Generation</b>			
549	Miscellaneous Other Power Generation	209	209	209
553	Maintenance of Generating and Electric Plant	707	707	707
554	Miscellaneous Other Power Generation Plant	35	35	35
	<b>Total Other Power Generation</b>	951	951	951
	<b>Distribution Expense</b>			
580	Supervision & Engineering	255	240	240
581	Load Dispatching	720	181	636
582	Station Expenses	28	28	28
583	Overhead Line Expenses	89	89	89
584	Underground Line Expenses	56	56	56
585	Street Lighting and Signal Systems	2	2	2
586	Meter Expenses	9	9	9
588	Miscellaneous Distribution Expenses	2,284	2,211	2,284
591	Structures	27	27	27
592	Station Equipment	82	82	82
593	Overhead Lines	2,288	1,954	2,000
594	Underground Lines	563	563	563
596	Street Light and Signal Systems	9	9	9
597	Meters	69	69	69
598	Miscellaneous Distribution Plant	817	817	817
	<b>Total Distribution Expenses</b>	7,297	6,337	6,911
	<b>Wildfire Mitigation and Vegetation Management</b>			
599	Wildfire Mitigation Expenses	2,468	806	1,750
599	Wildfire Insurance	10,438	7,164	7,164
599	Vegetation Management	13,785	8,717	11,000
	<b>Total Wildfire Mitigation and Vegetation Management</b>	26,691	16,687	19,914
	<b>Customer Accounts Expense</b>			
902	Meter Reading Expense	378	349	349
903	Customer Records and Collection Expense	1,538	1,453	1,453
904	Uncollectible Accounts	192	192	192
907	Supervision	288	265	265

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Account	Description	Liberty	Cal Advocates	Settled Position
908	Customer Assistance Expenses	1,376	1,123	1,376
910	Miscellaneous Customer Service and Informational	50	28	28
	<b>Total Customer Accounts Expense</b>	3,821	3,409	3,663
	<b>Administrative and General Expenses</b>			
920	Administrative and General Salaries	9,228	9,216	9,216
921	Office Supplies and Expenses	1,802	1,692	1,747
922	Administrative Expense Transferred	(3,143)	(3,143)	(3,143)
923	Outside Services Employed	1,613	1,580	1,580
924	Property Insurance	736	736	736
925	Injuries and Damages	734	734	734
926	Pensions and Benefits	2,087	1,927	2,087
928	Regulatory Commission Expenses	250	250	250
930	Miscellaneous General Expenses	73	42	42
931	Rents	1	1	1
935	Maintenance of General Plant	368	368	368
	<b>Total Administrative and General Expense</b>	13,749	13,402	13,617
	<b>TOTAL O&amp;M and A&amp;G EXPENSES</b>	52,510	40,786	45,055

### Operating Revenues \$(000)

Issue	Liberty	Cal Advocates	Settled Position
Sales Revenue	134,923	113,004	n/a
Other Operating Revenue	519	519	519
Revenue Credits	924	924	924
Energy Efficiency	476	250	250
Solar Initiative Program	423	423	423
Other Memo Accounts	13,827	13,827	13,827
<b>Total Operating Revenues</b>	151,091	128,948	n/a

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Operating Expenses \$(000)

Issue	Liberty	Cal Advocates	Settled Position
Fuel and Purchased Power	24,986	24,986	24,986
VM, CEMA, EE, SIP, BRRBA	14,726	14,500	14,500
Other O&M Expense	52,466	40,740	45,009
Depreciation and Amortization Expense	17,054	15,653	15,068
Taxes Other Than Income	6,888	6,726	6,794
Deferred Income Taxes	2,124	2,124	1,665
EADIT Amortization	(148)	(148)	(148)
Federal Income Tax	3,465	1,801	2,957
California Corporate Franchise Tax	441	124	523
<b>Total Operating Expenses</b>	<b>122,002</b>	<b>106,507</b>	<b>111,354</b>

### 2022 Rate Base \$(000)

Issue	Liberty	Cal Advocates	Settled Position
<b>Net Plant In Service</b>			
Gross Plant In Service	578,804	525,208	551,872
Accumulated Provision for Depreciation and Amortization	(109,369)	(108,683)	(108,220)
<b>Net Plant In Service</b>	<b>469,435</b>	<b>416,525</b>	<b>443,652</b>
<b>Additions</b>			
Materials and Supplies	7,741	7,741	7,741
Other Working Capital (Net)	5,834	4,351	5,100
Working Cash	2,052	-	1,000
<b>Total Additions</b>	<b>15,627</b>	<b>12,092</b>	<b>13,841</b>
<b>Deductions</b>			
Customer Advances for Construction	(17,590)	(17,590)	(17,590)
Accumulated Deferred Income Tax	(43,444)	(43,443)	(42,524)
Other Deductions – COR and EADIT	(32,140)	(32,140)	(32,140)
<b>Total Deductions</b>	<b>(93,175)</b>	<b>(93,174)</b>	<b>(92,255)</b>
<b>TOTAL RATE BASE</b>	<b>391,888</b>	<b>335,443</b>	<b>365,238</b>

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Depreciation Rates

Account	Description	Liberty	Cal Advocates	Settled Position
303	Software	10.14%	10.14%	10.14%
341	Structures and Improvements	1.89%	1.89%	1.89%
342	Fuel Holders, Prod, and Acc	1.92%	1.92%	1.92%
344	Generators	1.87%	1.87%	1.87%
346	Misc. Power Equipment	1.74%	1.74%	1.74%
360.2	Land Rights	0.66%	0.56%	0.56%
361	Structures and Improvements	1.92%	1.75%	1.75%
362	Station Equipment	1.74%	1.40%	1.40%
364	Poles, Towers, and Fixtures	2.54%	2.31%	2.31%
365	Overhead Conductors and Devices	3.00%	2.59%	2.59%
366	Underground Conduit	1.45%	1.41%	1.41%
367	Underground Conductor and Devices	2.53%	2.53%	2.53%
368	Line Transformers	2.61%	1.97%	1.97%
369	Services	1.93%	1.53%	1.53%
370	Meters	4.60%	2.28%	2.28%
371	Installs Customer Premise	3.19%	2.51%	2.51%
373	Street Lighting and Signal Systems	2.48%	2.38%	2.38%
389	Land Rights	1.32%	1.32%	1.32%
390	Structures and Improvements	1.63%	1.63%	1.63%
391	Office Furniture and Equipment	5.00%	5.00%	5.00%
392.1	Autos	5.95%	5.95%	5.95%
393	Stores Equipment	5.00%	5.00%	5.00%
394	Tool, Shop, and Garage Equipment	4.00%	4.00%	4.00%
396	Power Operated Equipment	5.72%	5.72%	5.72%
397	Communications Equipment	6.67%	6.67%	6.67%
398	Miscellaneous Equipment	5.00%	5.00%	5.00%

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### Cost of Capital

Issue	Liberty	Cal Advocates	Settled Position
Capital Structure – Debt	46.0%	47.5%	47.5%
Capital Structure - Equity	54.0%	52.5%	52.5%
Cost of Debt	3.81%	3.81%	3.81%
Return on Equity	10.5%	9.3%	n/a
Rate of Return	7.42%	6.69%	n/a

### Other Issues

Issue	Liberty		Cal Advocates	Settled Position
GRC Rate Cycle	Remain on three-year rate cycle	Proposes moving to a four-year cycle		Liberty to remain on a three-year cycle, with the next GRC being a 2025 Test Year.
PTAM Treatment	Proposes recovery of PTAM eligible projects in 2023 and 2024	Proposes recovery of capital via PTAM similar to what was authorized in the 2019 GRC Decision.		The PTAM eligible amounts would cover 2023-2024 by category over the two-year window, regardless of the year the capital closes to plant. See Capital (2023-2024) PTAM table above.

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### REVENUE ALLOCATION AND RATE DESIGN

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Determination of class revenue targets</b>	Proposes Equal Percentage of the Marginal Cost (EPMC) based revenue allocation with Residential Permanent and A-1 rates capped at overall increase	Proposes uniform increase to all classes based on overall increase	Accepts application of cap only on Residential Permanent and A-1. Proposes determination of revenues based on % marginal costs for generation, distribution demand, and distribution customer	Accepts Liberty's position	<p>Rejects Liberty's proposed revenues for non-permanent residential customers. Rates should be designed based on time of use and usage amount, not customer class.</p> <p>Opposed allocation of new hookup costs solely to non-permanent customers.</p> <p>Proposed adding specific definition for permanent residential customer to Liberty's tariff requiring 183 days of cumulative occupancy in home to qualify as permanent resident.</p> <p>Liberty should provide annual outreach to residential customers providing information about how to verify they are correctly classified as permanent or non-permanent and how to switch to the correct residential</p>	Cap and Collar mechanism implemented for non-wildfire costs, with cap at 75% of overall increase (39.8%) and floor at 14.5% of overall increase (19.4%).

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
					classification if there is an error.	
<b>Allocation of wildfire costs</b>	Proposes allocation of wildfire costs based on demand-related distribution marginal costs	Does not support separate wildfire cost allocation	Proposes wildfire costs be included as part of allocation of distribution demand costs.	Proposes allocation of wildfire costs based on 50% distribution demand cost allocation and 50% based on number of customers.		Wildfire costs allocated based on agreed upon allocation factors.
<b>Wildfire cost recovery</b>	Proposes recovery of wildfire costs via separate wildfire fixed charges	Does not support recovery of wildfire costs through fixed charges as it violates PU Code	Proposes wildfire costs be recovered through energy and/or demand charges	Accepts cost recovery through wildfire charges		Wildfire costs recovered through rate elements. No separate wildfire fixed charge
<b>Residential Permanent Rate Design</b>	Proposes uniform increase in all rate elements. Proposes Tier III energy charges	Accepts uniform increase in rate elements. Does not support proposed Tier III charges	Proposes rates to be aligned with class marginal costs of service.		<p>Opposed creation of Tier III for non-permanent residential customers and uniform rates for permanent and non-permanent residential customers in Tier II.</p> <p>Proposes equal allocation of new customer hook up charges between non-permanent and permanent residential classes rather than 100 percent to non-permanent.</p>	Customer charge increased to \$12.00, consistent with PU Code. Tier II energy charges designed to recover marginal costs. No Tier III charges.

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Residential Non-Permanent Rate Design</b>	Proposes separate rates for residential non-permanent customers. Proposes uniform increase in all rate elements. Proposes Tier III energy charges	Accepts creation of separate rate schedule and uniform increase in rate elements. Does not support proposed Tier III charges	Proposes rates to be aligned with class marginal costs of service.		Opposed creation of Tier III for non-permanent residential customers and uniform rates for permanent and non-permanent residential customers in Tier II. Proposes equal allocation of new customer hook up charges between non-permanent and permanent residential classes rather than 100 percent to non-permanent.	Separate rates for residential non-permanent customers. Customer charge increased to \$12.00, consistent with PU Code. No Tier III charges.
<b>A-1 Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.	Proposes rates to be aligned with class marginal costs of service.			Rate elements aligned with the marginal cost of service.
<b>A-2 Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.	Proposes rates to be aligned with marginal costs of service.			Rate elements aligned with the marginal cost of service, while addressing bill impact concerns. Customer charge capped at 2x current Generation charges aligned to recover marginal generation costs.
<b>A-3 Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.	Proposes rates to be aligned with marginal costs of service.	Proposes wildfire costs to be recovered from customer and demand charges.		Wildfire costs to be recovered through demand charges. Remaining revenue increase recovered through a uniform % increase in rate elements.



## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>PA, OLS, SL Rate Design</b>	Proposes uniform increase in all rate elements.	Accepts Liberty's proposed uniform increase in all rate elements.				Uniform % increase in rate elements.
<b>CARE discount</b>	Proposes increase to 25.0 percent	Does not support increase in CARE discount				No changes in CARE discount.
<b>Time of use periods</b>	Proposes to continue current TOU Periods.	Proposes alignment of TOU periods with underlying marginal costs	Proposes alignment of TOU periods with underlying marginal costs		Liberty should utilize its Customer First data systems to provide better cost of service study to adopt a rate design that relies on factors such as usage amount and time period rather than customer class.	No changes in current TOU periods.
<b>DCFC rates</b>	Developed on a revenue neutral basis with only energy charges	Rejects Liberty's proposal citing multiple reasons. Proposes Liberty re-file DCFC rates with improved analysis	Supports development of DCFC rates to recover marginal costs.			DCFC rates to be developed to recover marginal costs.

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

### MARGINAL COST STUDY

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Derivation of marginal generation capacity costs</b>	Proposes derivation based on a proxy natural gas combustion-turbine unit	Accepts Liberty's proposal.	Proposes utilizing MGCC based on battery storage resource including any reasonable estimates from other parties, or PG&E's recently approved MGCC	Accepts Liberty's proposal.		MGCC to be calculated based on PG&E's recently approved MGCC.
<b>Allocation of marginal generation capacity costs</b>	Proposes allocation based on POP 12CP method	Accepts Liberty's proposal.	Proposes allocation based on Winter system peak, and class contribution to system peak	Accepts Liberty's proposal.		Allocation based on POP 4CP method to align with winter system peak.
<b>Treatment of distribution demand non-substation costs</b>	Proposes 50% TOU-related and 50% non-TOU related	Accepts Liberty's proposal.	Proposes treatment of all distribution demand costs as 100% TOU related	Accepts Liberty's proposal.		Distribution demand non-substation costs to be treated as 50% TOU-related and 50% non-TOU related
<b>Allocation of TOU-related distribution demand costs</b>	Proposes allocation based on class usage in each TOU period	Accepts Liberty's proposal.	Proposes allocation based on Top 100 load hours	Accepts Liberty's proposal.		Allocation of TOU-related distribution demand costs to be based on Top 100 load hours
<b>Allocation of non-TOU-related distribution demand costs</b>	Proposes based on NCP demands and Transformer load study	Accepts Liberty's proposal.	Proposes treatment of all distribution demand costs as 100% TOU related. Proposes not utilizing Transformer Load study and NCP demands for allocation of distribution costs	Accepts Liberty's proposal.		Allocation of Non-TOU-related distribution demand costs to be based on NCP demands only

## CONSOLIDATED COMPARISON OF PARTY POSITIONS ON ALL SETTLED ISSUES

Issue	Liberty Utilities	Cal Advocates	SBUA	A-3	Tahoe ERG	Settled Position
<b>Determination of new customer hook-ups</b>	Proposes based on 2011-2024 customer growth	Accepts Liberty's proposal.	Proposes based on regression slope for 2012-2024 number of customers	Accepts Liberty's proposal.	Proposes equal allocation of new customer hook up charges between non-permanent and permanent residential classes rather than 100 percent to non-permanent.	Residential new hook-ups to be considered 50% related to non-permanent customers, and 50% related to permanent customers. New hook-ups to be determined based on 2012-2024 regression slope.
<b>Determination of underground investment %</b>	Proposes based on prior study estimates.	Accepts Liberty's proposal.	Proposes determination based on updated data provided in Liberty's discovery response	Accepts Liberty's proposal.		Determination based on updated data provided in Liberty's discovery response
<b>Determination of A-1 and A-2 customers served from transformers</b>	Proposes based on prior study estimates	Accepts Liberty's proposal.	Proposes determination based on Company's Discovery Response	Accepts Liberty's proposal.		Determination based on updated data provided in Liberty's discovery response
<b>Determination of customer-related distribution O&amp;M</b>	Proposes determination based on customer-related % investments	Accepts Liberty's proposal.	Proposes determination based on 2016-2020 FERC Form 1 Data	Accepts Liberty's proposal.		Determination based on 2016-2020 FERC Form 1 Data

## **APPENDIX B**

### **CLASS AVERAGE RATE SUMMARY\***

<b>Rate Schedule</b>	<b>Proposed Class Average Rate (\$ per kWh)</b>	<b>Current Class Average Rate (\$ per kWh)</b>	<b>Increase / (Decrease) (\$ per kWh)</b>	<b>Increase / (Decrease) (%)</b>
Residential Permanent Non-CARE	\$0.2227	\$0.1768	\$0.0459	26.0%
Residential Permanent CARE	\$0.1650	\$0.1367	\$0.0283	20.7%
Residential Non-Permanent	\$0.2318	\$0.1897	\$0.0422	22.2%
Small Commercial	\$0.2562	\$0.2186	\$0.0375	17.2%
Medium Commercial	\$0.2523	\$0.2171	\$0.0351	16.2%
Large Commercial	\$0.2553	\$0.2148	\$0.0406	18.9%
Irrigation	\$0.1841	\$0.1560	\$0.0281	18.0%
OLS**	\$24.54	\$13.48	\$11.06	82.0%
Street Lighting**	\$35.36	\$21.38	\$13.99	65.4%
<b>Total System</b>	<b>\$0.2415</b>	<b>\$0.2024</b>	<b>\$0.0391</b>	<b>19.3%</b>

Notes:

\* Average Rates include ECAC, SIP, PPP, BRRBA, and CPUC/CEC surcharges. VM surcharge is included in current average rates only.

\*\* For Lighting classes, rate comparison is on a 'per Lamp' basis.

## APPENDIX C

### MARGINAL COST OF SERVICE

#### Marginal Generation Capacity Costs: Derivation

PG&E Adopted MGCC pre-tax	\$	68.56
Post-Tax	\$	76.35
Tax Adder	\$	7.79
PG&E Property Tax Rate		1.25%
Liberty Property Tax		0.64%
Liberty Tax Adder	\$	3.99
Total MGCC, without PRM	\$	72.55
NV Power PRM		16%
Total MGCC, with PRM	\$	84.16
PRM is from:		
NV Power, Testimony of John McGinley, PUCN Docket # 21-060-01, (June 1, 2021, Volume 2), p. 4.		
This is based on the fact that Liberty's resource adequacy obligations are assigned by the NV Energy North System BAA.		
Source: Liberty 2020 IRP (September 1, 2020), R.20-05-003, p. 23.		
Tax Adder & PG&E Property tax rates from:		
Joint Stipulation of PG&E and CLECA, A.19-11-019 (January 21, 2022), pp. 2, 7.		

#### Marginal Generation Capacity Costs: Allocation to TOU Periods

<b>Generation Marginal Costs (\$/kW)</b>	\$	84.16	
<i>At Generation Level</i>			
<b>Generation Marginal Costs (TOU)</b>	<b>POP 12 CP</b>	<b>TOU Allocation</b>	
Winter TOU - Peak	56.7%	\$ 47.74	
Winter TOU - Mid-Peak	34.2%	28.81	
Winter TOU - Off-Peak	9.0%	7.60	
Summer TOU - Peak	0.0%	-	
Summer TOU - Off-Peak	0.0%	-	

## Marginal Distribution Demand Costs: Derivation

Line No.	Description	Adjustment Factor	Distribution (TOU)		Distribution (Non-TOU)		Line No.
			Substation Component	Non-Revenue Feeder	Substation Component	Non-Revenue Feeder	
	(a)	(b)	(c)	(d)	(h)	(i)	
1	Long Run Unit Investment		\$ 511.61	\$ 3,053.06	\$ 431.91	\$ 2,577.46	1
2	General Plant Loading (\$/kW)	5.84%	\$ 29.86	\$ 178.16	\$ 25.20	\$ 150.41	2
3	Annualized Deferral Value (\$/kW)	7.97%	\$ 43.13	\$ 257.39	\$ 36.41	\$ 217.30	3
4	Plant-Related A&G Loading (\$/kW)	1.34%	\$ 7.25	\$ 43.26	\$ 6.12	\$ 36.52	4
5	Annualized Cost (\$/kW)		\$ 50.38	\$ 300.65	\$ 42.53	\$ 253.82	5
6	Distribution O&M		\$ 19.50	\$ 79.94	\$ 19.50	\$ 79.94	6
7	With O&M-related A&G Loading	22.04%	\$ 23.80	\$ 97.56	\$ 23.80	\$ 97.56	7
8	Demand-related Costs Excl. Working Cap.		\$ 74.18	\$ 398.21	\$ 66.33	\$ 351.38	8
9	<b>Working Capital</b>						9
10	M&S	1.11%	\$ 6.03	\$ 35.97	\$ 5.09	\$ 30.37	10
11	CWC Plant-related	0.20%	\$ 1.07	\$ 6.39	\$ 0.90	\$ 5.39	11
12	O&M-related	2.32%	\$ 0.55	\$ 2.27	\$ 0.55	\$ 2.27	12
13	Total Working Capital		\$ 7.65	\$ 44.62	\$ 6.55	\$ 38.03	13
14	Revenue Requirement	9.46%	\$ 0.72	\$ 4.22	\$ 0.62	\$ 3.60	14
15	Total Demand-related		\$ 74.91	\$ 402.44	\$ 66.95	\$ 354.97	15
16	Adjusted for Losses (average)	11.20%	\$ 83.30	\$ 447.51	\$ 74.45	\$ 394.73	16
17	Final Unit Demand Cost (\$/kW)		\$ 83.30	\$ 447.51	\$ 74.45	\$ 394.73	17

## Marginal Distribution Demand Costs (TOU): Allocation

	Substation	Non-Revenue	Weighted Cost							
Distribution Marginal Costs (\$/kW)	\$ 83.30	\$ 447.51	\$ 307.05							
TOU Demand Percentage	100%	50%								
Distribution Marginal Costs (TOU)	Top 100 Hours %	TOU Allocation								
Winter TOU - Peak	57.6%	\$ 176.86								
Winter TOU - Mid-Peak	37.8%	\$ 116.06								
Winter TOU - Off-Peak	4.6%	\$ 14.12								
Summer TOU - Peak	0.0%	\$ -								
Summer TOU - Off-Peak	0.0%	\$ -								
Distribution (TOU) Cost Allocation	Total Company	Residential Permanent	Residential Non-Permanent	S-M Master Residential	Small Commercial	Medium Commercial	Large Commercial	Irrigation	OLS	Street Lighting
Average Top 100 Hours (kWh)										
Winter TOU - Peak	106,916	27,295	33,471	402	13,670	9,859	22,034	4	115	67
Winter TOU - Mid-Peak	102,159	21,048	30,394	348	14,729	9,946	25,690	2	1	1
Winter TOU - Off-Peak	101,991	21,192	28,797	335	12,900	11,142	27,448	6	109	64
Summer TOU - Peak	-	-	-	-	-	-	-	-	-	-
Summer TOU - Off-Peak	-	-	-	-	-	-	-	-	-	-
Average Top 100 Hours (kWh)	311,066	69,535	92,662	1,084	41,299	30,946	75,172	11	225	132
Distribution Cost Allocation (\$)										
Winter TOU - Peak	\$ 18,909,292	\$ 4,827,475	\$ 5,919,776	\$ 71,055	\$ 2,417,656	\$ 1,743,613	\$ 3,896,941	\$ 630	\$ 20,257	\$ 11,890
Winter TOU - Mid-Peak	11,857,006	2,442,895	3,527,686	40,377	1,709,551	1,154,340	2,981,752	193	134	79
Winter TOU - Off-Peak	1,440,555	299,317	406,735	4,728	182,198	157,369	387,682	81	1,539	903
Summer TOU - Peak	-	-	-	-	-	-	-	-	-	-
Summer TOU - Off-Peak	-	-	-	-	-	-	-	-	-	-
Distribution Costs (TOU) (\$)	\$ 32,206,853	\$ 7,569,687	\$ 9,854,197	\$ 116,161	\$ 4,309,405	\$ 3,055,323	\$ 7,266,374	\$ 904	\$ 21,930	\$ 12,873

## Marginal Distribution Demand Costs (Non-TOU): Allocation

Distribution Marginal Costs (\$/kW)	Substation \$74.45	Non-Revenue \$394.73	Weighted Cost \$ 197.37							
Non-TOU Demand Percentage	0%	50%								
Distribution (Non-TOU) Cost Allocation	Total Company	Residential Permanent	Residential Non-Permanent	S-M Master Residential	Small Commercial	Medium Commercial	Large Commercial	Irrigation	OLS	Street Lighting
NCP Demands (MW)	143,419	33,481	41,859	992	18,672	13,286	35,128			
Cost Allocation (2) (\$)	\$ 28,305,928	\$ 6,607,936	\$ 8,261,541	\$ 195,811	\$ 3,685,252	\$ 2,622,240	\$ 6,933,149			
Dist. Costs (Non-TOU) (\$)	\$ 28,305,928	\$ 6,607,936	\$ 8,261,541	\$ 195,811	\$ 3,685,252	\$ 2,622,240	\$ 6,933,149	\$ -	\$ -	\$ -

## Marginal Distribution Customer Costs: Derivation

Customer-Related Investment: Transformer, Service and Metering Costs											
Marginal Customer Costs Using the NCO Method											
Line No.	Description	Adjustment Factor	Residential Permanent	Residential Non-Permanent	S-M Master Residential	Small Commercial	Medium Commercial	Large Commercial	Irrigation	OLS	Street Lighting
1	Long Run Unit Investment		\$ 1,828.18	\$ 1,828.18	\$ 9,292.28	\$ 3,103.27	\$ 13,264.22	\$ 50,739.50	\$ 10,814.31	\$ 897.81	\$ 1,087.82
2	With General Plant Loading	5.84%	\$ 1,934.87	\$ 1,934.87	\$ 9,834.54	\$ 3,284.36	\$ 14,038.27	\$ 53,700.45	\$ 11,445.39	\$ 950.20	\$ 1,151.30
3	PVRR Cost	143%	\$ 2,763.05	\$ 2,763.05	\$ 14,044.01	\$ 4,690.16	\$ 20,047.05	\$ 76,685.81	\$ 16,344.35	\$ 1,356.92	\$ 1,644.08
4	Estimated Average Annual New Hookups		100	100	3	4	4	-	-	-	0
5	Total CA customers		17,656	25,660	571	5,323	254	53	10	1,236	683
6	Replacements at 1.5% of 2019 customers	1.50%	265	385	9	80	4	1	-	19	10
7	PVRR of new hookups plus replacements		\$ 1,008.51	\$ 1,340.08	\$ 163.35	\$ 396.15	\$ 158.04	\$ 76.69	\$ -	\$ 25.78	\$ 16.53
8	PVRR per customer		\$ 57.12	\$ 52.22	\$ 286.31	\$ 74.42	\$ 622.19	\$ 1,446.90	\$ -	\$ 20.86	\$ 24.20
9	Plant-Related A&G Loading	1.34%	\$ 0.76	\$ 0.70	\$ 3.83	\$ 1.00	\$ 8.33	\$ 19.37	\$ -	\$ 0.28	\$ 0.32
10	With A&G Loading		\$ 57.88	\$ 52.92	\$ 290.14	\$ 75.42	\$ 630.52	\$ 1,466.27	\$ -	\$ 21.14	\$ 24.52
11	Customer Plant-Related O&M		\$ 5.68	\$ 5.68	\$ 28.89	\$ 9.65	\$ 41.24	\$ 157.75	\$ 33.62	\$ 43.94	\$ 31.49
12	Customer Accounts and Service										
13	Customer Accounts		\$ 42.87	\$ 42.87	\$ 52.73	\$ 52.73	\$ 193.35	\$ 2,246.93	\$ 52.73	\$ 35.03	\$ 615.82
14	Customer Service		\$ 10.11	\$ 10.11	\$ 37.09	\$ 37.09	\$ 269.02	\$ 7,005.02	\$ 37.09	\$ 24.64	\$ 433.12
15	Subtotal Customer-related O&M		\$ 58.66	\$ 58.66	\$ 118.71	\$ 99.47	\$ 503.61	\$ 9,409.71	\$ 123.44	\$ 103.61	\$ 1,080.42
16	With Labor-related A&G Loading	22.04%	\$ 71.59	\$ 71.59	\$ 144.87	\$ 121.39	\$ 614.60	\$ 11,483.49	\$ 150.65	\$ 126.45	\$ 1,318.53
17	Customer-related Costs Exc. Working Capital		\$ 129.47	\$ 124.51	\$ 435.01	\$ 196.81	\$ 1,245.12	\$ 12,949.77	\$ 150.65	\$ 147.58	\$ 1,343.06
18	<b>Working Capital</b>										
19	M&S	1.11%	\$ 21.54	\$ 21.54	\$ 109.48	\$ 36.56	\$ 156.28	\$ 597.82	\$ 127.42	\$ 10.58	\$ 12.82
20	CWC Plant-related	0.20%	\$ 3.82	\$ 3.82	\$ 19.44	\$ 6.49	\$ 27.75	\$ 106.15	\$ 22.62	\$ 1.88	\$ 2.28
21	O&M-related	2.32%	\$ 1.66	\$ 1.66	\$ 3.36	\$ 2.82	\$ 14.27	\$ 266.66	\$ 3.50	\$ 2.94	\$ 30.62
22	Total Working Capital		\$ 27.03	\$ 27.03	\$ 132.29	\$ 45.87	\$ 198.30	\$ 970.62	\$ 153.54	\$ 15.39	\$ 45.71
23	Revenue Requirement	9.46%	\$ 2.56	\$ 2.56	\$ 12.52	\$ 4.34	\$ 18.77	\$ 91.86	\$ 14.53	\$ 1.46	\$ 4.33
24	Customer Common		\$ 64.80	\$ 64.80	\$ 109.86	\$ 109.86	\$ 565.51	\$ 11,315.79	\$ 109.86	\$ 72.99	\$ 1,282.92
25	Customer Specific		\$ 67.24	\$ 62.28	\$ 337.68	\$ 91.30	\$ 698.37	\$ 1,725.84	\$ 55.32	\$ 76.05	\$ 64.46
26	Total Customer-related		\$ 132.03	\$ 127.07	\$ 447.53	\$ 201.15	\$ 1,263.88	\$ 13,041.63	\$ 165.18	\$ 149.04	\$ 1,347.38
27	Monthly Cost		\$ 11.00	\$ 10.59	\$ 37.29	\$ 16.76	\$ 105.32	\$ 1,086.80	\$ 13.76	\$ 12.42	\$ 112.28
28	Number of Customers		17,656	25,660	571	5,323	254	53	10	920	29
										1,236	683
29	Total Customer Common		\$ 1,144,053	\$ 1,662,644	\$ 62,676	\$ 584,763	\$ 143,640	\$ 599,737	\$ 1,089	\$ 67,148	\$ 37,098
30	Total Customer Specific		\$ 1,187,141	\$ 1,597,996	\$ 192,652	\$ 485,960	\$ 177,387	\$ 91,469	\$ 549	\$ 94,004	\$ 44,021

## **APPENDIX D**

### **BASE RATE REVENUE ALLOCATION SUMMARY**

<b>Rate Schedule</b>	<b>Proposed Revenues (\$)</b>	<b>Current Revenues (\$)</b>	<b>Increase / (Decrease) (\$)</b>	<b>Increase / (Decrease) (%)</b>
Residential Permanent Non-CARE	\$19,029,297	\$13,569,218	\$5,460,079	40.2%
Residential Permanent CARE	\$3,073,872	\$1,995,235	\$1,078,637	54.1%
Residential Non-Permanent	\$27,220,893	\$17,925,019	\$9,295,874	51.9%
Small Commercial	\$16,713,900	\$12,515,344	\$4,198,557	33.5%
Medium Commercial	\$11,524,811	\$8,849,575	\$2,675,235	30.2%
Large Commercial	\$19,127,144	\$14,550,924	\$4,576,220	31.4%
Irrigation	\$66,087	\$48,137	\$17,951	37.3%
OLS	\$328,595	\$173,851	\$154,744	89.0%
Street Lighting	\$169,900	\$90,506	\$79,394	87.7%
Other Operating Revenues	\$1,443,215	\$1,443,215	\$0	0.0%
<b>Total System</b>	<b>\$98,697,714</b>	<b>\$71,161,023</b>	<b>\$27,536,691</b>	<b>38.7%</b>



## APPENDIX E

### RATE DESIGN

#### Residential Permanent Rate Design

Base Revenues	Base Rates	Other Charges	Total Rates					
Target Base Rates	22,103,169	\$ 7,937,907	\$ 30,041,076					
Current Base Rates	15,564,453	\$ 8,970,952	\$ 24,535,405					
\$ Difference	6,538,716	(1,033,045)	5,505,671					
% Difference	42.0%		22.4%					
Residential Permanent Tier III Rates	Customer Charge	Distribution Rate	Generation Rate	Billing Determinants	Customer Revenues	Distribution Revenues	Generation Revenues	Total Revenues
<b>Revised Rates</b>								
Customer Charge	\$ 12.00			214,666	\$ 2,575,991			\$ 2,575,991
				214,666	-			-
Tier 1 Energy		\$ 0.11035	\$ 0.01700	92,999,141		10,262,049	1,581,029	11,843,077
Tier 2 Energy		\$ 0.13103	\$ 0.03137	47,314,942		6,199,846	1,484,255	7,684,101
<b>Revenue at Revised Rates</b>				<b>140,314,083</b>	<b>\$ 2,575,991</b>	<b>\$ 16,461,895</b>	<b>\$ 3,065,283</b>	<b>\$ 22,103,169</b>
<b>Current Rates</b>								
Customer Charge	\$ 9.67			219,296	\$ 2,120,594			\$ 2,120,594
Tier 1 Energy		\$ 0.08197	\$ 0.00911	96,281,508		7,892,195	877,125	8,769,320
Tier 2 Energy		\$ 0.08197	\$ 0.01681	47,322,728		3,879,044	795,495	4,674,539
<b>Revenue at Current Rates</b>				<b>143,604,236</b>	<b>\$ 2,120,594</b>	<b>\$ 11,771,239</b>	<b>\$ 1,672,620</b>	<b>\$ 15,564,453</b>

#### Residential Non-Permanent Rate Design

Base Revenues	Base Rates	Other Charges	Total Rates					
Target Base Rates	27,220,893	\$ 10,555,648	\$ 37,776,541					
Current Base Rates	17,925,019	\$ 10,992,483	\$ 28,917,502					
\$ Difference	9,295,874	(436,835)	8,859,039					
% Difference	51.9%		30.6%					
Residential Non-Permar Tier III Rates	Customer Charge	Distribution Rate	Generation Rate	Billing Determinants	Customer Revenues	Distribution Revenues	Generation Revenues	Total Revenues
<b>Revised Rates</b>								
Customer Charge	\$ 12.00			311,972	\$ 3,743,664			\$ 3,743,664
Tier 1 Energy						-	-	-
Tier 2 Energy		\$ 0.12659	\$ 0.02124	158,808,179		20,103,496	3,373,733	23,477,229
<b>Revenue at Revised Rates</b>				<b>158,808,179</b>	<b>\$ 3,743,664</b>	<b>\$ 20,103,496</b>	<b>\$ 3,373,733</b>	<b>\$ 27,220,893</b>
<b>Current Rates</b>								
Customer Charge	\$ 9.67			304,428	\$ 2,943,817			\$ 2,943,817
Tier 1 Energy						-	-	-
Tier 2 Energy		\$ 0.08197	\$ 0.01681	151,662,300		12,431,759	2,549,443	14,981,202
<b>Revenue at Current Rates</b>				<b>151,662,300</b>	<b>\$ 2,943,817</b>	<b>\$ 12,431,759</b>	<b>\$ 2,549,443</b>	<b>\$ 17,925,019</b>

## A-1 Rate Design

Base Revenues	Base Rates	Other Charges	Total Rates					
Target Base Rates	16,713,900	\$ 9,203,489	\$ 25,917,389					
Current Base Rates	12,515,344	\$ 10,095,502	\$ 22,610,846					
\$ Difference	4,198,557	(892,013)	3,306,543					
% Difference	33.5%		14.6%					
A-1 Class Rate Design	Customer Charge	Distribution Rate	Generation Rate	Billing Determinants	Customer Revenues	Distribution Revenues	Generation Revenues	Total Revenues
<b>Proposed Rates (A-1 &lt;= 20kW)</b>								
Customer Charge	\$ 23.63			59,375	\$ 1,403,296			\$ 1,403,296
Energy		\$ 0.13272	\$ 0.02024	61,420,183		8,151,403	1,243,180	9,394,583
<b>Proposed Rates (A-1A &gt; 20 kW)</b>								
Customer Charge	\$ 23.63			4,500	106,368			106,368
Energy		\$ 0.13272	\$ 0.02024	37,982,522		5,040,865	768,788	5,809,653
Revenue at Proposed Rates				99,402,704	\$ 1,509,663	\$ 13,192,268	\$ 2,011,969	\$ 16,713,900
<b>Current Rates (A-1 &lt;= 20kW)</b>								
Customer Charge	\$ 17.38			60,378	\$ 1,049,371			\$ 1,049,371
Energy		\$ 0.09335	\$ 0.01867	63,685,729		5,945,063	1,189,013	7,134,075
<b>Current Rates (A-1A &gt; 20 kW)</b>								
Customer Charge	\$ 17.38			4,446	77,270			77,270
Energy		\$ 0.09335	\$ 0.01867	37,980,960		3,545,523	709,105	4,254,627
Revenue at Current Rates				101,666,688	\$ 1,126,641	\$ 9,490,585	\$ 1,898,117	\$ 12,515,344

## A-2 Rate Design

Base Revenues	Base Rates	Other Charges	Total Rates					
Target Base Rates	11,524,811	\$ 6,092,291	\$ 17,617,102					
Current Base Rates	8,849,575	\$ 6,480,720	\$ 15,330,296					
\$ Difference	2,675,235	(388,429)	2,286,806					
% Difference	30.2%		14.9%					
A-2 Class Rate Design	Customer Charge	Distribution Rate	Generation Rate	Billing Determinants	Customer Revenues	Distribution Revenues	Generation Revenues	Total Revenues
<b>Proposed Rates (A-2)</b>								
Customer Charge	\$87.56			3,048	\$ 266,883			\$ 266,883
Winter Energy		\$ 0.14154	\$ 0.01167	45,574,506		6,450,570	531,871	6,982,441
Summer Energy		\$ 0.06511	\$ 0.01102	21,720,176		1,414,257	239,295	1,653,552
Winter Demand		\$ 9.42	\$ 4.16	139,842		1,317,083	581,845	1,898,928
Summer Demand		\$ 9.42	-	61,966		583,620	-	583,620
Power Factor				0.00561%	\$ 15	\$ 548	\$ 76	639
V/T Discount				-0.00539%	\$ (14)	\$ (526)	\$ (73)	(614)
<b>Proposed Rates (A-2 TOU)</b>								
Customer Charge	\$ 87.56			-	\$ -			\$ -
Winter Energy - On-Peak		\$ 0.31338	\$ 0.01500	131,045		41,067	1,965	43,032
Winter Energy - Mid-Peak		\$ 0.14617	\$ 0.00745	187,889		27,463	1,400	28,863
Winter Energy - Off-Peak		\$ 0.02157	\$ 0.01502	194,953		4,205	2,929	7,134
Summer Energy - OnPeak		\$ 0.06511	\$ 0.00953	236,540		15,402	2,254	17,656
Summer Energy - Off-Peak		\$ 0.06511	\$ 0.01269	196,029		12,764	2,488	15,252
Winter Demand - On-Peak		\$ -	\$ 4.64	1,441		-	-	-
Winter Demand - Mid-Peak			\$ 4.64	1,522		-	7,057	7,057
Winter Demand - Off-Peak		\$ -	\$ 4.64			-	-	-
Summer Demand - OnPeak			\$ -	1,359		-	-	-
Summer Demand - Off-Peak		\$ -	\$ -			-	-	-
Non-TOU Maximum		\$ 9.42		2,165		20,393	-	20,393
Revenue at Proposed Rates				68,241,136	\$ 266,883	\$ 9,886,823	\$ 1,371,104	\$ 11,524,811

## A-3 Rate Design

Base Revenues	Base Rates	Other Charges	Total Rates					
Target Base Rates	19,127,144	\$ 10,659,345	\$ 29,786,490					
Current Base Rates	14,550,924	\$ 11,128,658	\$ 25,679,582					
\$ Difference	4,576,220	(469,312)	4,106,908					
% Difference	31.4%		16.0%					
A-3 Class Rate Design	Customer	Distribution	Generation	Billing	Customer	Distribution	Generation	Total
Proposed Rates	Charge	Rate	Rate	Determinants	Revenues	Revenues	Revenues	Revenues
<b>Proposed Rates (A-3)</b>								
Customer Charge	\$ 722.91			636	\$ 459,772			\$ 459,772
Winter Energy - On-Peak		\$ 0.04510	\$ -	17,245,812		777,726	-	777,726
Winter Energy - Mid-Peak		\$ 0.03852	\$ -	34,278,478		1,320,495	-	1,320,495
Winter Energy - Off-Peak		\$ 0.02032	\$ -	32,556,978		661,625	-	661,625
Summer Energy - OnPeak		\$ 0.05972	\$ -	16,441,052		981,924	-	981,924
Summer Energy - Off-Peak		\$ 0.03227	\$ -	14,679,055		473,688	-	473,688
<b>Non-WMP</b>								
Winter Demand - On-Peak		\$ 10.01	\$ 2.60	360,936		3,612,064	937,021	4,549,085
Winter Demand - Mid-Peak		\$ 2.96	\$ 1.79	424,779		1,256,912	758,891	2,015,803
Summer Demand - OnPeak		\$ 4.19	\$ 16.64	117,999		494,090	1,963,186	2,457,276
Non-TOU Maximum		\$ 8.12	\$ -	463,582		3,765,783	-	3,765,783
<b>WMP Rates</b>								
Winter Demand - On-Peak		\$ 1.31		360,936		\$ 474,311		474,311
Winter Demand - Mid-Peak		\$ 0.97		424,779		\$ 410,106		410,106
Non-TOU Maximum		\$ 1.82		463,582		\$ 843,858		843,858
<b>Total Demand</b>								
Winter Demand - On-Peak		\$ 11.32	\$ 2.60	360,936		4,086,374	937,021	5,023,395
Winter Demand - Mid-Peak		\$ 3.92	\$ 1.79	424,779		1,667,018	758,891	2,425,909
Summer Demand - OnPeak		\$ 4.19	\$ 16.64	117,999		494,090	1,963,186	2,457,276
Non-TOU Maximum		\$ 9.94	\$ -	463,582		4,609,641	-	4,609,641
Power Factor				0.03612%	166	5,444	1,322	6,932
V/T Discount				-0.37120%	(1,707)	(55,949)	(13,583)	(71,239)
Revenue at Proposed Rates				115,201,374	\$ 459,772	\$ 13,344,307	\$ 3,659,097	\$ 19,127,144

## PA Rate Design

Base Revenues	Base Rates	Other Charges	Total Rates						
Target Base Rates	66,087	\$ 68,681	\$ 134,768						
Current Base Rates	48,137	\$ 82,775	\$ 130,912						
\$ Difference	17,951	(14,095)	3,856						
% Difference	37.3%		2.9%						
PA Rate Design	Customer Charge	Distribution Rate	Generation Rate	Billing Determinants	Customer Revenues	Distribution Revenues	Generation Revenues	Total Revenues	
<b>Proposed Rates</b>									
Customer Charge	\$ 23.86			119	\$ 2,839		\$	2,839	
Energy		\$ 0.04355	\$ 0.04171	119 741,788	-	32,305	30,943	- 63,248	
Revenue at Proposed Rates				741,788	\$ 2,839	\$ 32,305	\$ 30,943	\$ 66,087	
<b>Current Rates</b>									
Customer Charge	\$ 17.38			229	\$ 3,980		\$	3,980	
Energy		\$ 0.02753	\$ 0.02637	819,233		22,553	21,603	44,157	
Revenue at Current Rates				819,233	\$ 3,980	\$ 22,553	\$ 21,603	\$ 48,137	

## OL Rate Design

Base Revenues	Base Rates		Other Charges		Total Rates	
Target Base Rates	328,595	\$	35,076	\$	363,670	
Current Base Rates	173,851	\$	40,970	\$	214,821	
\$ Difference	154,744		(5,894)		148,849	
% Difference	89.0%				69.3%	

HPS Outdoor Lights Rate Design	Distribution Rate		Generation Rate		Billing Determinants		Distribution Revenues	Generation Revenues	Total Revenues		
<b>Proposed Rates (OLS)</b>											
Existing, Overhead Pole Rates by Lumen											
5,800 Lumen Light @ 29 kWh/mo.	\$	21.29	\$	0.20	6,266		133,378	1,239	134,617		
9,500 Lumen Light @ 41 kWh/mo.		21.51		0.34	6,220		133,794	2,119	135,912		
16,000 Lumen Light @ 67 kWh/mo.		22.27		0.51	2,255		50,226	1,145	51,371		
22,000 Lumen Light @ 85 kWh/mo.		23.01		0.56	91		2,087	51	2,138		
These Poles/Service add to the Existing Pole Rate (above)											
New Wood Pole	\$	15.40	\$	-	74		1,141	-	1,141		
New Metal Pole (< 22,000 lumens)		20.34	\$	-	111		2,260	-	2,260		
New Metal Pole (=> 22,000 lumens)		21.61		-	-		-	-	-		
Underground Service		10.40	\$	-	111		1,156	-	1,156		
Revenue at Proposed Rates					14,832	\$	324,040	\$	4,555	\$	328,595
<b>Current Rates (OLS)</b>											
Existing, Overhead Pole Rates by Lumen											
5,800 Lumen Light @ 29 kWh/mo.	\$	10.41	\$	0.10	6,781		70,567	656	71,222		
9,500 Lumen Light @ 41 kWh/mo.		10.68		0.17	6,625		70,787	1,121	71,908		
16,000 Lumen Light @ 67 kWh/mo.		11.13		0.25	2,387		26,573	606	27,179		
22,000 Lumen Light @ 85 kWh/mo.		11.83		0.29	93		1,104	27	1,131		
These Poles/Service add to the Existing Pole Rate (above)											
New Wood Pole	\$	8.16			74		604	-	604		
New Metal Pole (< 22,000 lumens)		10.77			111		1,196	-	1,196		
New Metal Pole (=> 22,000 lumens)		11.44			-		-	-	-		
Underground Service		5.51			111		611	-	611		
Revenue at Current Rates					15,887	\$	171,441	\$	2,410	\$	173,851

## SL Rate Design

Base Revenues	Base Rates		Other Charges		Total Rates	
Target Base Rates	169,900	\$	20,585	\$	190,485	
Current Base Rates	90,506	\$	24,660	\$	115,166	
\$ Difference	79,394		(4,074)		75,320	
% Difference	87.7%				65.4%	

HPS Street Lights Rate Design	Distribution Rate	Generation Rate	Billing Determinants	Distribution Revenues	Generation Revenues	Total Revenues
<b>Proposed Rates (SL)</b>						
Existing, Overhead Pole Rates by Lumen						
5,800 Lumen Light @ 29 kWh/mo.	\$ 27.40	\$ 0.12	747	20,478	93	20,571
9,500 Lumen Light @ 41 kWh/mo.	27.26	0.21	1,009	27,509	208	27,717
22,000 Lumen Light @ 79 kWh/mo.	33.26	0.44	3,608	120,016	1,596	121,612
These Poles/Service add to the Existing Pole Rate (above)						
New Wood Pole	\$ 15.89					
New Metal Pole (< 22,000 lumens)	21.89					
New Metal Pole (=> 22,000 lumens)	22.25					
Underground Service total	10.76					
Total, poles			5,729			
Underground Service			2,830			
Revenue at Proposed Rates			5,364	\$ 168,003	\$ 1,897	\$ 169,900
<b>Current Rates (SL)</b>						
Existing, Overhead Pole Rates by Lumen						
5,800 Lumen Light @ 29 kWh/mo.	\$ 15.73	\$ 0.07	693	10,909	50	10,958
9,500 Lumen Light @ 41 kWh/mo.	15.78	0.12	929	14,654	111	14,765
22,000 Lumen Light @ 79 kWh/mo.	17.06	0.23	3,748	63,933	850	64,783
These Poles/Service add to the Existing Pole Rate (above)						
New Wood Pole	\$ 8.47					
New Metal Pole (< 22,000 lumens)	11.66					
New Metal Pole (=> 22,000 lumens)	11.85					
Underground Service total	5.73					
Total, poles			5,729			
Underground Service			2,830			
Revenue at Current Rates			5,370	\$ 89,495	\$ 1,011	\$ 90,506

## **ATTACHMENT C**

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC**  
**SUMMARY OF RESULTS OF OPERATIONS - CALIFORNIA JURISDICTION**  
**FOR THE FORECASTED TWELVE MONTHS ENDING DECEMBER 31, 2022**  
**(IN THOUSANDS)**

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
		Forecast Results of	Less ECAC, VM, CEMA,	Forecast Results Ex ECAC	Additional Revenue	General Rate Revenue Requirement	Add ECAC, VM, CEMA	Total Revenue Requirement
No.	Development of Return	Operations	EE and SIP	(b) + (d)	Required	(d) + (e)	EE and SIP	(f) + (g)
1	Operating Revenues							
2	Sales Revenue	\$ 94,703	\$ (24,986)	\$ 69,718	\$ 26,145	\$ 95,863	\$ 24,986	\$ 120,848
3	Other Operating Revenue	519	-	519	-	519	-	519
4	Revenue Credits	924	-	924	-	924	-	924
5	Energy Efficiency (EE)	476	(476)	-	-	-	250	250
6	Solar Initiative Program (SIP)	423	(423)	-	-	-	423	423
7	Vegetation Management (VM)	3,060	(3,060)	-	-	-	-	-
8	Other Memo Accts BRRBA	15,295	(15,295)	-	-	-	13,827	13,827
9	Total Operating Revenues	115,400	(44,239)	71,161	26,145	97,306	39,485	136,791
10		115,400						18.54%
11	Operating Expenses							
12	Fuel & Purchased Power	24,986	(24,986)	-	-	-	24,986	24,986
13	ECAC	-	-	-	-	-	-	-
14	Total Fuel & Purchased Power Expense	24,986	(24,986)	-	0	-	24,986	24,986
18	VM, CEMA, EE, SIP, BRRBA	19,253	(19,253)	-	-	-	14,500	14,500
15	Other O&M Expense	45,002	-	45,002	7	45,009	-	45,009
16	Total Operation & Maintenance	89,241	(44,239)	45,002	7	45,009	39,485	84,494
17	Depreciation & Amortization Expense	15,068	-	15,068	-	15,068	-	15,068
19	Taxes Other Than Income	6,592	-	6,592	192	6,784	-	6,784
20	Deferred Income Taxes	1,665	-	1,665	-	1,665	-	1,665
21	EADIT Amortization	(148)	-	(148)	-	(148)	-	(148)
22	Federal Income Tax	(2,390)	-	(2,390)	5,095	2,705	-	2,705
23	California Corporate Franchise Tax	(1,255)	-	(1,255)	1,694	439	-	439
24	Total Operating Expenses	108,773	(44,239)	64,534	6,988	71,522	39,485	111,008
25								
26	Operating Income	\$ 6,627	\$ -	\$ 6,627	\$ 19,157	\$ 25,784	\$ -	\$ 25,784
27								
28	Rate Base							
29	Gross Plant in Service	\$ 551,872	\$ -	\$ 551,872	\$ -	\$ 551,872	\$ -	\$ 551,872
30	Accum Prov for Depr & Amort	(108,220)	-	(108,220)	-	(108,220)	-	(108,220)
31	Net Plant in Service	443,652	-	443,652	-	443,652	-	443,652
32								
33	Additions							
34		-	-	-	-	-	-	-
35	Materials & Supplies	7,741	-	7,741	-	7,741	-	7,741
36	Other Working Capital (Net)	5,100	-	5,100	-	5,100	-	5,100
37	Other Additions	-	-	-	-	-	-	-
38	Working Cash	1,000	-	1,000	-	1,000	-	1,000
39	Total Additions	13,841	-	13,841	-	13,841	-	13,841
40								
41	Deductions							
42	Customer Advances for Construction	(17,590)	-	(17,590)	-	(17,590)	-	(17,590)
43	Accumulated Deferred Income Tax	(42,524)	-	(42,524)	-	(42,524)	-	(42,524)
44	Other Deductions - COR & EADIT	(32,140)	-	(32,140)	-	(32,140)	-	(32,140)
45	Total Deductions	(92,255)	-	(92,255)	-	(92,255)	-	(92,255)
46								
47	Rate Base	\$ 365,238	\$ -	\$ 365,238	\$ -	\$ 365,238	\$ -	\$ 365,238
48								
49	Rate of Return (%)	1.81%		1.81%		7.06%		7.06%

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC**  
**SUMMARY OF RESULTS OF OPERATIONS - CALIFORNIA JURISDICTION**  
**FOR THE FORECASTED TWELVE MONTHS ENDING DECEMBER 31, 2023**  
**(IN THOUSANDS)**

Line No.	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	Development of Return	Forecast Results of Operations	Less ECAC, VM, CEMA, EE and SIP	Forecast Results Ex ECAC (b) + (d)	Additional Revenue Required	General Rate Revenue Requirement (d) + (e)	Add ECAC, VM, CEMA EE and SIP	Total Revenue Requirement (f) + (g)
1	Operating Revenues							
2	Sales Revenue	\$ 120,848	\$ (24,986)	\$ 95,863	\$ 14,118	\$ 109,980	\$ 24,986	\$ 134,966
3	Other Operating Revenue	519	-	519	-	519	-	519
4	Revenue Credits	924	-	924	-	924	-	924
5	Energy Efficiency (EE)	250	(250)	-	-	-	250	250
6	Solar Initiative Program (SIP)	423	(423)	-	-	-	423	423
7	Vegetation Management (VM)	-	-	-	-	-	-	-
8	Other Memo Accts	13,827	(13,827)	-	-	-	8,401	8,401
9	Total Operating Revenues	136,791	(39,485)	97,306	14,118	111,423	34,059	145,482
10								
11	Operating Expenses							
12	Fuel & Purchased Power	24,986	(24,986)	-	-	-	24,986	24,986
13	ECAC	-	-	-	-	-	-	-
14	Total Fuel & Purchased Power Expense	24,986	(24,986)	-	0	-	24,986	24,986
18	VM, CEMA, EE, SIP	14,500	(14,500)	-	-	-	9,073	9,073
15	Other O&M Expense	48,850	-	48,850	4	48,854	-	48,854
16	Total Operation & Maintenance	88,336	(39,485)	48,850	4	48,854	34,059	82,913
17	Depreciation & Amortization Expense	19,041	-	19,041	-	19,041	-	19,041
19	Taxes Other Than Income	7,010	-	7,010	104	7,114	-	7,114
20	Deferred Income Taxes	1,881	-	1,881	-	1,881	-	1,881
21	EADIT Amortization	(148)	-	(148)	-	(148)	-	(148)
22	Federal Income Tax	499	-	499	2,751	3,250	-	3,250
23	California Corporate Franchise Tax	(196)	-	(196)	915	719	-	719
24	Total Operating Expenses	116,423	(39,485)	76,937	3,773	80,710	34,059	114,769
25								
26	Operating Income	\$ 20,369	\$ -	\$ 20,369	\$ 10,344	\$ 30,713	\$ -	\$ 30,713
27								
28	Rate Base							
29	Gross Plant in Service	\$ 641,473	\$ -	\$ 641,473	\$ -	\$ 641,473	\$ -	\$ 641,473
30	Accum Prov for Depr & Amort	(119,886)	-	(119,886)	-	(119,886)	-	(119,886)
31	Net Plant in Service	521,587	-	521,587	-	521,587	-	521,587
32								
33	Additions							
34		-	-	-	-	-	-	-
35	Materials & Supplies	8,510	-	8,510	-	8,510	-	8,510
36	Other Working Capital (Net)	5,100	-	5,100	-	5,100	-	5,100
37	Other Additions	-	-	-	-	-	-	-
38	Working Cash	1,000	-	1,000	-	1,000	-	1,000
39	Total Additions	14,610	-	14,610	-	14,610	-	14,610
40								
41	Deductions							
42	Customer Advances for Construction	(17,590)	-	(17,590)	-	(17,590)	-	(17,590)
43	Accumulated Deferred Income Tax	(51,388)	-	(51,388)	-	(51,388)	-	(51,388)
44	Other Deductions - COR & EADIT	(32,193)	-	(32,193)	-	(32,193)	-	(32,193)
45	Total Deductions	(101,172)	-	(101,172)	-	(101,172)	-	(101,172)
46								
47	Rate Base	\$ 435,025	\$ -	\$ 435,025	\$ -	\$ 435,025	\$ -	\$ 435,025
48								
49	Rate of Return (%)	4.68%		4.68%		7.06%		7.06%



**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC**  
**SUMMARY OF RESULTS OF OPERATIONS - CALIFORNIA JURISDICTION**  
**FOR THE FORECASTED TWELVE MONTHS ENDING DECEMBER 31, 2024**  
**(IN THOUSANDS)**

Line No.	(a) Development of Return	(b) Forecast Results of Operations	(c) Less ECAC, VM, CEMA, EE and SIP	(d) Forecast Results Ex ECAC (b) + (d)	(e) Additional Revenue Required	(f) General Rate Revenue Requirement (d) + (e)	(g) Add ECAC, VM, CEMA EE and SIP	(h) Total Revenue Requirement (f) + (g)
1	Operating Revenues							
2	Sales Revenue	\$ 134,966	\$ (24,986)	\$ 109,980	\$ 7,164	\$ 117,144	\$ 24,986	\$ 142,130
3	Other Operating Revenue	519	-	519	-	519	-	519
4	Revenue Credits	924	-	924	-	924	-	924
5	Energy Efficiency (EE)	250	(250)	-	-	-	250	250
6	Solar Initiative Program (SIP)	423	(423)	-	-	-	423	423
7	Vegetation Management (VM)	-	-	-	-	-	-	-
8	Other Memo Accts	8,401	(8,401)	-	-	-	1,318	1,318
9	Total Operating Revenues	145,482	(34,059)	111,423	7,164	118,588	26,976	145,563
10								
11	Operating Expenses							
12	Fuel & Purchased Power	24,986	(24,986)	-	-	-	24,986	24,986
13	ECAC	-	-	-	-	-	-	-
14	Total Fuel & Purchased Power Expense	24,986	(24,986)	-	0	-	24,986	24,986
18	VM, CEMA, EE, SIP	9,073	(9,073)	-	-	-	1,990	1,990
15	Other O&M Expense	49,827	-	49,827	2	49,829	-	49,829
16	Total Operation & Maintenance	83,886	(34,059)	49,827	2	49,829	26,976	76,805
17	Depreciation & Amortization Expense	20,794	-	20,794	-	20,794	-	20,794
19	Taxes Other Than Income	7,289	-	7,289	69	7,357	-	7,357
20	Deferred Income Taxes	3,543	-	3,543	-	3,543	-	3,543
21	EADIT Amortization	(148)	-	(148)	-	(148)	-	(148)
22	Federal Income Tax	1,819	-	1,819	1,616	3,436	-	3,436
23	California Corporate Franchise Tax	307	-	307	537	845	-	845
24	Total Operating Expenses	117,491	(34,059)	83,432	2,224	85,656	26,976	112,632
25								
26	Operating Income	\$ 27,991	\$ -	\$ 27,991	\$ 4,940	\$ 32,931	\$ -	\$ 32,931
27								
28	Rate Base							
29	Gross Plant in Service	\$ 698,663	\$ -	\$ 698,663	\$ -	\$ 698,663	\$ -	\$ 698,663
30	Accum Prov for Depr & Amort	(135,682)	-	(135,682)	-	(135,682)	-	(135,682)
31	Net Plant in Service	562,981	-	562,981	-	562,981	-	562,981
32								
33	Additions							
34	Construction Work In Progress	-	-	-	-	-	-	-
35	Materials & Supplies	8,510	-	8,510	-	8,510	-	8,510
36	Other Working Capital (Net)	5,100	-	5,100	-	5,100	-	5,100
37	Other Additions	-	-	-	-	-	-	-
38	Working Cash	1,000	-	1,000	-	1,000	-	1,000
39	Total Additions	14,610	-	14,610	-	14,610	-	14,610
40								
41	Deductions							
42	Customer Advances for Construction	(17,590)	-	(17,590)	-	(17,590)	-	(17,590)
43	Accumulated Deferred Income Tax	(61,345)	-	(61,345)	-	(61,345)	-	(61,345)
44	Other Deductions - COR & EADIT	(32,193)	-	(32,193)	-	(32,193)	-	(32,193)
45	Total Deductions	(111,128)	-	(111,128)	-	(111,128)	-	(111,128)
46								
47	Rate Base	\$ 466,463	\$ -	\$ 466,463	\$ -	\$ 466,463	\$ -	\$ 466,463
48								
49	Rate of Return (%)	6.00%		6.00%		7.06%		7.06%

**(END OF ATTACHMENT C)**

# **ATTACHMENT D**

## Liberty Utilities (CalPeco Electric)

### 2022 Summary of Authorized Rates

2022 Residential Rate Breakdown (\$/kWh)													
Schedule	Fixed Charge	Distribution	Generation	ECAC - Offset	ECAC - Balancing	SIP	PPP-CARE	WNRBBA	PPP-EE	CPUC/CEC	GHG	BRRBA	Total
<b>RESIDENTIAL: Permanent</b>													
Tier 1	12.00	0.10937	0.01662	0.03461	0.00953	0.00072	0.00187	0.00089	0.00081	0.00160	0.00555	0.01006	0.19163
Tier 2		0.12921	0.03067	0.05254	0.00953	0.00072	0.00187	0.00089	0.00081	0.00160	0.00555	0.01006	0.24345
<b>RESIDENTIAL: Non-Permanent</b>													
Tier 2	12.00	0.12407	0.02077	0.05254	0.00953	0.00072	0.00187	0.00089	0.00081	0.00160	0.00555	0.01006	0.22840
<b>RESIDENTIAL: CARE</b>													
Tier 1	9.60	0.07417	0.01662	0.03461	0.00953	0.00072	-	0.00089	0.00081	0.00160	0.00555	0.01006	0.15456
Tier 2		0.08425	0.03067	0.05254	0.00953	0.00072	-	0.00089	0.00081	0.00160	0.00555	0.01006	0.19661

Average Customer Bill Impacts	Number of Customers	2022 kWh Forecast	T1 Use	Authorized Average Bill	Current Average Bill	\$ Increase	% Increase
Permanent	14,141	669	433	\$152.43	\$124.33	\$28.10	22.6%
Non-Primary	25,998	509	0	\$128.25	\$105.35	\$22.90	21.7%
CARE	3,748	595	434	\$108.33	\$89.22	\$19.11	21.4%

2022 A-1 Rate Breakdown (\$/kWH)												
Schedule	Fixed Charge	Distribution	Generation	ECAC - Offset	ECAC - Balancing	SIP	PPP-CARE	PPP-EE	CEC/CPUC	GHG	BRRBA	Total
A-1	23.63	0.13145	0.01979	0.04368	0.00953	0.00072	0.00187	0.00081	0.00160	0.00555	0.03772	0.25271

Average Customer Bill	Number of Customers	2022 kWh Forecast	Authorized Average Bill	Current Average Bill	\$ Increase	% Increase
<b>A-1</b>	5,323	1,556	\$416.86	\$359.43	\$57.42	16.0%

2022 A-2 Rate Breakdwn (\$/kWh)														
Schedule	Fixed Charge	Distribution - Demand	Generation - Demand	Distribution	Generation	ECAC - Offset	ECAC - Balancing	SIP	PPP-CARE	PPP-EE	CEC/CPUC	GHG	BRRBA	Total
A-2														
Winter Energy	87.56	9.30		0.13969	0.01141	0.02852	0.00953	0.00072	0.00187	0.00081	0.00160	0.00555	0.03772	0.23742
Summer Energy	87.56		4.07	0.06516	0.01077	0.06281	0.00953	0.00072	0.00187	0.00081	0.00160	0.00555	0.03772	0.19654
Average Customer Bill	Number of Customers	Summer kWh	Winter kWh	Summer kWh	Winter kWh	Authorized Average Bill	Current Average Bill	\$ Increase	% Increase					
A-2	254	7,126	14,952	43	100	\$6,143.31	\$5,007.07	\$1,136.23	22.7%					

[illegible]

Average Customer Bill	Blended KW Rate	Demand Charges	Fixed	Blended Volumetric Rate	Volumetric Charges	Total
Winter	9.37	\$11,570.08	\$722.91	0.09812	\$12,972.16	\$25,265.15
On	6.32			0.02233		
Mid	3.05			0.04272		
Off				0.03308		
Summer	20.57	\$3,825.60		0.03942	\$1,929.05	\$5,754.65
On	20.57			0.02333		
Off				0.01609		
Max	9.83	\$7,165.23				\$7,165.23
<b>Total</b>		<b>\$22,560.91</b>	<b>\$722.91</b>		<b>\$14,901.20</b>	<b>\$38,185.03</b>

2022 Public Authority Rate Breakdown (\$/kWh)													
Schedule	Fixed Charge	Distribution	Generation	ECAC - Offset	ECAC - Balancing	SIP	PPP-CARE	Veg Mgmt	PPP-EE	CEC/CPUC	GHG	BRRBA	Total
PA	23.86	0.04304	0.04122	0.04368	0.00953	0.00072	0.00187	0.00807	0.00081	0.00160	0.00555	0.03772	0.19381
Average Customer Bill	Number of Customers	2022 kWh Forecast	Authorized Average Bill	Current Average Bill	\$ Increase	% Increase							
PA	10	6,234	\$1,232.05	\$1,036.31	\$195.73	18.9%							

2022 Street Light Rate Breakdown												
HPS Street Light	Distribution	Generation	ECAC - Offset	ECAC - Balancing	CARE	EE	SIP	Veg Mgmt	CEC/ PUC	GHG	BRRBA	Total
5,800 Lumen Light @ 29 kWh/mo.	26.94	0.12	1.27	0.28	0.05	0.02	0.02	0.29	0.05	0.16	0.29	29.49
9,500 Lumen Light @ 41 kWh/mo.	26.80	0.20	1.79	0.39	0.08	0.03	0.03	0.42	0.06	0.23	0.41	30.44
22,000 Lumen Light @ 85 kWh/mo.	32.70	0.43	3.45	0.74	0.15	0.06	0.06	0.80	0.12	0.44	0.79	39.75
Average Customer Bill	Number of Customers	Authorized Average Bill	Current Average Bill	\$ Increase	% Increase							
5800 Lumen @ 29 kWh	62	\$29.49	\$18.23	\$11.26	61.7%							
9500 Lumen @ 41 kWh	84	\$30.44	\$19.34	\$11.10	57.4%							
22000 Lumen @ 85 kWh	301	\$39.76	\$23.90	\$15.85	66.3%							

2022 Outdoor Light Rate Breakdown												
HPS Outdoor Light	Distribution	Generation	ECAC - Offset	ECAC - Balancing	CARE	EE	SIP	Veg Mgmt	CEC/ PUC	GHG	BRRBA	Total
5,800 Lumen Light @ 29 kWh/mo.	20.93	0.19	1.27000	0.28	0.05	0.02	0.02	0.15	0.05	0.16	0.29	23.41
9,500 Lumen Light @ 41 kWh/mo.	21.15	0.33	1.79000	0.39	0.08	0.03	0.03	0.21	0.06	0.23	0.41	24.71
16,000 Lumen Light @ 67 kWh/mo.	21.9	0.50	2.92000	0.64	0.13	0.05	0.05	0.35	0.11	0.37	0.67	27.69
22,000 Lumen Light @ 85 kWh/mo.	22.62	0.55	3.71000	0.81	0.16	0.07	0.06	0.44	0.14	0.47	0.85	29.88
Average Customer Bill	Number of Customers	Authorized Average Bill	Current Average Bill	\$ Increase	% Increase							
5800 Lumen @ 29 kWh	522	\$23.41	\$12.79	\$10.62	83.0%							
9500 Lumen @ 41 kWh	518	\$24.71	\$14.08	\$10.63	75.5%							
16000 Lumen @ 67 kWh	188	\$27.69	\$16.68	\$11.01	66.0%							
22000 Lumen @ 85 kWh	8	\$29.88	\$18.83	\$11.05	58.7%							

**(END OF ATTACHMENT D)**