

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



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Order Instituting Rulemaking to Improve the  
California Climate Credit.

Rulemaking 25-07-013R2507013  
(Filed July 24, 2025)

**DATA REPORT OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)**

**Dated: August 10, 2026**

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
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Order Instituting Rulemaking to Improve the  
California Climate Credit.

Rulemaking 25-07-013  
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**DATA REPORT OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)**

Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits the attached report (Attachment A) in accordance with the Assigned Commissioner’s Ruling Providing Direction and Setting the Phase 1B Procedural Schedule, issued June 29, 2026. Ordering Paragraph (OP) 3 provides:

Before filing and serving the data filings described in Section 5, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities, Bear Valley Electric Service, Inc., PacifiCorp, Southern California Gas Company, and Southwest Gas shall coordinate with Energy Division staff to confirm the format they anticipate using to provide the data, and to clarify as needed any questions about the requested data. The utilities shall be responsive to Energy Division staff directions and clarifications regarding data format and content.

Liberty confirms that, in coordination with the other named utilities, it has complied with the above paragraph by consulting with Energy Division staff regarding the requested data. Liberty also hereby submits the requested data report as Attachment A.

Respectfully submitted,

/s/ Elly O’Doherty

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**Dated: August 10, 2026**

**Attachment A**  
**Data Report**

# **DATA REQUEST RESPONSE**

## **LIBERTY UTILITIES (CALPECO ELECTRIC) LLC**

### **DATA REQUEST**

Liberty's Responses to Section 5 of the June 29, 2026 Assigned Commissioner's Ruling.

#### **5. Data Filings Required from Utilities**

##### **A. Tariff Types**

- a. Count of Climate Credit eligible residential electric accounts by tariff type, including NEM/NBT, with a notation if that tariff type (can be in the accompanying narrative) includes a baseline allowance.
  - i. Please see attached "Liberty's Response to 6.29.26 Ruling Section 5 Data Request.xlsx", tab 5.A.a.
- b. For Climate Credit eligible residential accounts on a tariff with a baseline allowance, for each tariff the number and percentage of Climate Credit eligible residential accounts that exceeded the baseline usage in the new Climate Credit distribution months (October and November for small and multi-jurisdictional IOUs).
  - i. Please see attached "Liberty's Response to 6.29.26 Ruling Section 5 Data Request.xlsx", tab 5.A.b.
- c. Data demonstrating the proportion of CARE/non-CARE customers within quartiles or other category of usage. The purpose of this data request is to ascertain rough proportions of CARE/non-CARE customers across usage levels.
  - i. Please see attached "Liberty's Response to 6.29.26 Ruling Section 5 Data Request.xlsx", tab 5.A.c.
  - ii. Please note, the data excludes customers with less than 12 months of usage. For customers whose status changed between CARE and non-CARE during the 12-month period, the data assumes the customer is CARE.

## **B. Climate Zone**

- a. Count of master metered Climate Credit eligible residential accounts by climate zone
- b. Count of NEM/NBT customers by climate zone
- c. Count of CARE & Non-CARE residential Climate Credit eligible residential accounts by climate zone
- d. Count of FERA & non-FERA Climate Credit eligible residential accounts by climate zone
- e. Energy usage billing determinants by climate zone
- f. The number of residential Climate Credit eligible accounts in each climate zone on a tariff with and without a baseline component
- g. Residential baseline quantities per climate zone, along with an explanation of how the baseline quantity is derived
  - i. For questions B.(a)-(g) please note that Liberty's customer base all fall within a single climate zone.
  - ii. Please see attached "Liberty's Response to 6.29.26 Ruling Section 5 Data Request.xlsx", tab 5.B.(a)-(g).

## **C. Non-Primary Residences**

If the utility tracks primary/non-primary residences by tariff or by other means:

- a. A narrative of how the primary/non-primary determination is made
  - i. Residential Non-Permanent Customer: Account holders who live in their home in Liberty's service territory less than a cumulative 183 days per year.
  - ii. Residential Permanent Customer: 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) or more per year and do not have any electric service from another California electric utility where they receive any baseline allocation.
- b. The count of primary and non-primary residential Climate Credit eligible accounts
  - i. Primary resident Climate Credit eligible accounts: 20,151
  - ii. Non-Primary resident Climate Credit eligible accounts: 26,951

- c. Average annual kWh usage of non-primary residential accounts: 5,356 kWh

#### **D. Customer Billing**

- a. For residential Climate Credit eligible accounts, the average usage and bills by month broken across CARE status for each climate zone.
  - i. Please note that Liberty's customer base all fall within a single climate zone. Please see attached "Liberty's Response to 6.29.26 Ruling Section 5 Data Request.xlsx", tab 5.D.a.

#### **E. Volumetric Credit**

Please estimate:

- a. The volumetric discount in cents-per-kWh of a simple volumetric Climate Credit based on all usage without distinction to time of usage
- b. An estimate of how much Climate Credit (total distribution amount, not the volumetric discount) the average customer by customer class would receive in each climate zone under a simple time-agnostic return volumetric return
- c. The rate and bill impacts for residential non-CARE and CARE customers and all other customer classes of a simple time-agnostic volumetric Climate Credit
- d. The same information in (a), (b), and (c) above but for a volumetric return based only on peak usage rather than all usage regardless of time.
  - i. For questions E.(a)-(d) please note that Liberty's customer base all fall within a single climate zone.
  - ii. Please see attached "Liberty's Response to 6.29.26 Ruling Section 5 Data Request.xlsx", tab 5.E.(a)-(d).

A.a. Count of Climate Credit eligible residential electric accounts by tariff type, including NEM/NBT, with a notation if that tariff type (can be in the accompanying narrative) includes a baseline allowance.

**Non-NEM**

| <b>Tariff Type</b> | <b>Non-Permanent</b> | <b>Permanent</b> | <b>Grand Total</b> | <b>Baseline Allowance</b> |
|--------------------|----------------------|------------------|--------------------|---------------------------|
| D-1                | 26653                | 13881            | 40534              | Yes                       |
| D-1 (All Electric) | 132                  | 1648             | 1780               | Yes                       |
| D-1 TOU            | 58                   | 54               | 112                | No                        |
| D-1 TOU EV         | 108                  | 290              | 398                | No                        |
| CARE               |                      | 4278             | 4278               | Yes                       |

**NEM**

| <b>Tariff Type</b> | <b>Non-Permanent</b> | <b>Permanent</b> | <b>Grand Total</b> | <b>Baseline Allowance</b> |
|--------------------|----------------------|------------------|--------------------|---------------------------|
| D-1                |                      |                  | 725                | Yes                       |

\*Permanent/Non-Permanent designation is not readily available in Liberty's NEM customer data

A.b. For Climate Credit eligible residential accounts on a tariff with a baseline allowance, for each tariff the number and percentage of Climate Credit eligible

|                    | Oct-25       |            | Nov-25       |            |              |
|--------------------|--------------|------------|--------------|------------|--------------|
| Tariff             | #            | %          | #            | %          | Grand Total  |
| CARE               | 1,345        | 3%         | 1,135        | 2%         | 1,538        |
| Permanent          | 5,478        | 12%        | 4,663        | 10%        | 6,114        |
| <b>Grand Total</b> | <b>6,823</b> | <b>15%</b> | <b>5,798</b> | <b>12%</b> | <b>7,652</b> |

A.c. Data demonstrating the proportion of CARE/non-CARE customers within quartiles or other category of usage. The purpose of this data request is to

| Quartile           | CARE       | Non-CARE   |
|--------------------|------------|------------|
| Q1 (0-25%)         | 9%         | 91%        |
| Q2 (25-50%)        | 13%        | 87%        |
| Q3 (50-75%)        | 12%        | 88%        |
| Q4 (75-100%)       | 10%        | 90%        |
| <b>Grand Total</b> | <b>11%</b> | <b>89%</b> |

B.(a)-(g). Climate Zone

|                                                                                                                                |             |
|--------------------------------------------------------------------------------------------------------------------------------|-------------|
| Count of master metered Climate Credit eligible residential accounts by climate zone                                           | 50          |
| Count of NEM/NBT customers by climate zone                                                                                     | 3           |
| Count of CARE residential Climate Credit eligible residential accounts by climate zone                                         | 4,278       |
| Count of Non-CARE residential Climate Credit eligible residential accounts by climate zone                                     | 42,698      |
| Count of FERA & non-FERA Climate Credit eligible residential accounts by climate zone                                          | -           |
| Energy usage billing determinants by climate zone                                                                              | 262,285,958 |
| The number of residential Climate Credit eligible accounts in each climate zone on a tariff with and with a baseline component | 46,222      |
| The number of residential Climate Credit eligible accounts in each climate zone on a tariff without a baseline component       | 526         |
| Residential baseline quantities per climate zone*                                                                              | 14.5, 19.0  |

\*Liberty provides baseline quantities for Summer and Winter, respectively.

Baseline quantities for All-Electric Use are 16.4 and 31.4 for Summer and Winter, respectively.

Baseline quantities are established to provide the quantity necessary to supply a significant portion of the reasonable energy needs of the average residential customer. Summer baseline quantities are used for billing periods that fall between May 1-October 1. Winter baseline quantities are used for billing periods that fall between November 1-April 30.

D.a.Customer Billing

| Average kWh / Customer |       |       |       |       |       |       |       |       |       |       |       |       |             |
|------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------------|
| Customer Class         | Jan   | Feb   | Mar   | Apr   | May   | Jun   | Jul   | Aug   | Sep   | Oct   | Nov   | Dec   | Grand Total |
| CARE                   | 715   | 667   | 624   | 607   | 444   | 413   | 409   | 392   | 399   | 463   | 503   | 607   | 6,243       |
| Non-Permanent          | 748   | 703   | 665   | 579   | 386   | 369   | 447   | 428   | 372   | 389   | 422   | 537   | 6,044       |
| Permanent              | 789   | 744   | 703   | 658   | 479   | 449   | 457   | 430   | 427   | 484   | 533   | 642   | 6,795       |
| Grand Total            | 2,251 | 2,113 | 1,991 | 1,843 | 1,308 | 1,232 | 1,313 | 1,250 | 1,198 | 1,336 | 1,459 | 1,786 | 19,082      |

E.(a)-(d). Volumetric Credit

| Customer Class | Volumetric Discount (\$/kWh) | Estimated Climate Credit (\$/Customer) | Bill Impact (\$/Customer) | Bill Impact (%/Customer) |
|----------------|------------------------------|----------------------------------------|---------------------------|--------------------------|
| CARE           | 0.17949                      | 86.74                                  | -23.42                    | -18%                     |
| Non-Permanent  | 0.17949                      | 72.78                                  | -16.11                    | -9%                      |
| Permanent      | 0.17949                      | 91.31                                  | -36.33                    | -18%                     |

|               | Peak Usage                   |                                        |                           |                          |
|---------------|------------------------------|----------------------------------------|---------------------------|--------------------------|
|               | Volumetric Discount (\$/kWh) | Estimated Climate Credit (\$/Customer) | Bill Impact (\$/Customer) | Bill Impact (%/Customer) |
| CARE          | 0.17949                      | 52.30                                  | 35.20                     | 28%                      |
| Non-Permanent | 0.17949                      | 26.71                                  | 34.08                     | 20%                      |
| Permanent     | 0.17949                      | 34.96                                  | 34.10                     | 17%                      |