

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

Order Instituting Rulemaking to Evaluate the  
Mobilehome Park Pilot Program and to Adopt  
Programmatic Modifications.

R.18-04-018

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL MOBILE  
HOME PARK UTILITY CONVERSION PILOT PROGRAM REPORT  
(FOR THE PERIOD JANUARY 1 TO DECEMBER 31, 2019)  
IN COMPLIANCE WITH D.14-03-021**

ANNA VALDBERG  
ANDREA TOZER

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Rosemead, California 91770  
Telephone: (626) 302-6713  
Facsimile: (626) 302-6693  
E-mail: Andrea.Tozer@sce.com

Dated: February 3, 2020

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Southern California Edison Company (SCE) hereby timely submits its fifth annual report on the Mobile Home Park (MHP) Utility Conversion Pilot Program, which was established to help convert mobilehome parks and manufactured housing communities (collectively, MHPs) from master-meter/submeter service to direct service.<sup>1</sup> SCE’s annual MHP report for the period of January 1 to December 31, 2019, attached hereto, provides a narrative program assessment (Appendix A), data in the MHP Annual Report Template (Attachment 1) and an updated list of all MHP conversions completed and those in progress, including their city and county, space count, gas utility and electric utility (Attachment 2).

In Decision (D.) 14-03-021 (“the Decision”), approved on March 13, 2014, the Commission authorized the three-year MHP pilot program.<sup>2</sup> Resolution E-4878, issued on September 28, 2017, directed the utilities to continue the MHP pilot program until the earlier

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<sup>1</sup> SCE’s first annual report was served on February 1, 2016.

<sup>2</sup> D.14-03-021, Ordering Paragraph (OP) 2.

date of December 31, 2019, or the issuance of a Commission decision for the continuation, expansion, or modification of the program.<sup>3</sup> Resolution E-4958, issued on March 14, 2019, directed the utilities to continue the MHP pilot program, subject to certain limitations, until the earlier date of December 31, 2021, or the issuance of a Commission decision for the continuation, expansion, or modification of the program.<sup>4</sup>

Section 4.3.4 of the Decision established annual reporting requirements for the three-year pilot. These requirements were continued with modifications in an email from Fred Hanes, with the Commission's Safety Enforcement Division, on December 21, 2018. Mr. Hanes' email directed utilities to submit an Annual Report for the 2018 calendar year on February 1, 2019, using an MHP Annual Report Template that was similar to a template developed and used by the utilities to report Supplemental Data to the Commission on November 16, 2018.<sup>5</sup> Additionally, in an email sent on January 7, 2019, Mr. Hanes clarified that (1) the same filing requirements in the Decision apply to the MHP Annual Report due on February 1, 2019, (2) utilities are to provide an updated list of all MHP conversions completed and those in progress, including city and county, space count, gas utility company and electric utility company, and (3) utilities are encouraged to provide a narrative program assessment.

In accordance with OP 11 of the Decision, SCE's annual report was verified by an officer of SCE, and is being concurrently submitted to the Commission's Executive Director, with copies submitted to each Commissioner, the Chief Administrative Law Judge, the Director of the Energy Division, and the Director of the Safety and Enforcement Division. Additionally, SCE is providing a list of all the MHP conversions completed and in progress within its territory, and is submitting a narrative program assessment along with the data requested in the MHP Annual Report Template.

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<sup>3</sup> Resolution E-4878, OP 7.

<sup>4</sup> Resolution E-4958, OP 1.

<sup>5</sup> On May 7, 2018, the Commission approved "Order Instituting Rulemaking (R.18-04-018) to Evaluate the Mobilehome Park Pilot Program and Adopt Programmatic Modifications."

Respectfully submitted,

ANNA VALDBERG  
ANDREA TOZER

*/s/ Andrea Tozer*

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By: Andrea Tozer

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Rosemead, California 91770  
Telephone: (626) 302-6713  
Facsimile: (626) 302-6693  
E-mail: [Andrea.Tozer@sce.com](mailto:Andrea.Tozer@sce.com)

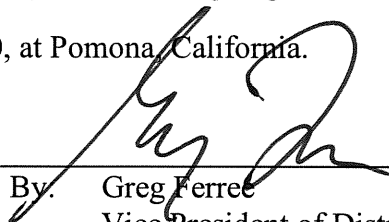
February 3, 2020

**VERIFICATION**

I am an officer of the electric utility submitting this report, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 23, 2020, at Pomona, California.

  
By. Greg Ferree  
Vice President of Distribution

SOUTHERN CALIFORNIA EDISON COMPANY  
3 Innovation Way  
Pomona, California 91768

**Appendix A**

**SCE Mobile Home Park Utility Conversion Pilot Program Annual Report  
(For the Period January 1 to December 31, 2019) in Compliance with D.14-03-021**

## 1. Executive Summary

On March 13, 2014, the California Public Utilities Commission (CPUC) approved and authorized Southern California Edison Company (SCE) to execute the Mobilehome Park Utility Upgrade Program (Program) through Decision (D.)14-03-021 (the Decision). The Program is a three-year pilot (2015-2017) to convert master-metered/sub-metered electric and gas services to direct utility services for qualified mobilehome parks and manufactured housing communities (collectively MHPs).

Resolution E-4878, issued on September 28, 2017, directed the utilities to continue to “complete all Category 1 MHP conversions as established in D.14-03-021 (approximately 10 percent of the MHP spaces) and work on Category 2 and 3 MHPs until the earlier date of December 31, 2019 or the issuance of a Commission Decision for the continuation, expansion or modification of the program.”<sup>6</sup>

Resolution E-4958, issued on March 14, 2019, directed the utilities to “continue their Mobile Home Park (MHP) Utility Upgrade Pilot Program until the earlier date of either December 31, 2021, or the issuance of a Commission Decision for the continuation, expansion or modification of the program beyond December 31, 2020 in Rule-Making R.18-04-018, subject to the limitations in Ordering Paragraph 2.”<sup>7</sup> Ordering Paragraph 2 limits eligible MHPs to those for which the utilities and/or MHP owners have incurred financial obligations on or before November 1, 2018.<sup>8</sup> It further limits the number of eligible spaces to 3.33% annually of the total master-metered spaces in a utility’s service territory, unless a single MHP upgrade would exceed the 3.33% limit, and sets prioritization criteria for MHP conversions.<sup>9</sup>

OP 10 of the Decision directs each electric and/or gas utility to prepare a status report for the Program on February 1 of each year through 2018. SCE timely filed status reports on February 1, 2016 through 2018 as directed. On December 21, 2018, Fred Hanes, with the Commission’s Safety Enforcement Division sent an email directing utilities to submit an Annual Report for the 2018 calendar year on February 1, 2019.

Utilities were also instructed to use an MHP Annual Report Template that is similar to the template used by the utilities to report Supplemental Data to the Commission on November 16, 2018. Additionally, in an email sent on January 7, 2019, Mr. Hanes clarified that (1) the same filing requirements in the Decision apply to the February 1, 2019 report, (2) a narrative program assessment is encouraged, and (3) utilities should provide an updated list of all MHP conversions completed and those in progress, including city and county, space count, gas utility company and electric utility company.

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<sup>6</sup> Resolution E-4878, OP 7.

<sup>7</sup> Resolution E-4958, OP 1.

<sup>8</sup> Resolution E-4958, OP 2.a.

<sup>9</sup> Resolution E-4958, OP 2.b-d.

From inception of the Program through December 31, 2019, SCE has converted 200 MHPs with a combined total of 12,215 spaces. The total conversion cost for these MHPs is \$185,048,863, resulting in a current average per-space cost of \$15,149.



## 2. Program Implementation

The Program was planned to achieve the conversion, on a combined to-the-meter (TTM) and beyond-the-meter (BTM) basis, of 10 percent of the estimated MHP spaces in SCE's service territory, which represents approximately 10,800 spaces. Subsequently Resolution E-4878 authorized SCE to convert up to an additional 20 percent of the MHP spaces by December 31, 2019, or the issuance of a Commission Decision to continue, expand or modify the MHP Program.<sup>10</sup>

Since inception of the Program, 63 parks have dropped out and SCE has worked with the Commission to identify additional MHPs to participate in the Program. To reach the Program's goal, SCE developed a robust process to perform the MHP conversions and, where possible, dual conversions (natural gas and electric) have been planned through joint efforts with impacted gas service providers. Additionally, joint trenching opportunities were leveraged with the MHP's existing telecommunications provider(s). As of December 31, 2019, SCE has completed 274 MHP designs and converted 200 MHPs, with 20 MHPs scheduled or under construction in 2020. SCE plans to complete all qualified Program parks provided in D.14-03-021 and a majority of Program extension parks provided in Resolution E-4878 by year end 2020.

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<sup>10</sup> Resolution E-4878 OP 2 approved SCE's request for continuation of the MHP program, as requested in Advice 3576-E. In compliance with the requirements in Resolution E-4878, the Director of the Energy Division approved SCE's Advice Letters 3576-E-A, 3576-E-B on March 9, 2018, with an effective date of October 5, 2017. SCE's advice letters proposed to expand the MHP Program up to an additional 20 percent of MHP spaces.

### 3. Cost Assessment

As of December 31, 2019, SCE had fully converted 200 MHPs with a combined total of 12,215 spaces. SCE considers an MHP to be “Converted” after System Cutover has occurred, master meter removed, and all financial obligations have been fulfilled. System cutover is defined as all residential spaces that have switched from the park owned legacy electrical system to a direct service SCE electrical system and legacy meter removed or transferred to common area only usage. In accordance with OP 10 of the Decision, SCE’s preliminary quantification of construction costs, TTM and BTM, incurred per space are detailed in the attached MHP Annual Report Data Template. Costs may vary depending on multiple factors, including availability of contractors, geographic location, etc.

TTM Costs include costs for the portion paid by SCE for TTM activities, which are shared with other participating utilities where service territories overlap. These costs include trenching and paving, company labor in support of the program including to-the-meter work for selected MHPs, meter installation and master meter removal.

BTM Contractor Costs are costs reimbursed to the MHP owner/operator or paid to the BTM Contractor to perform the BTM construction work.

#### 4. Program Assessment

The purpose of implementing the Program was to conduct a pilot during which the investor-owned utilities (“IOUs”) and the Commission could assess the feasibility and effectiveness of a mobilehome park conversion program as outlined in the Ordering Paragraphs of D.14-03-021. The Decision authorized IOUs to implement a three-year pilot program to convert approximately 10 percent of master-metered/sub-metered services within applicable mobile home parks to direct utility service. Subsequently Resolution E-4878 authorized SCE to convert up to an additional 20 percent of the MHP spaces by December 31, 2019, or the issuance of a Commission Decision to continue, expand or modify the MHP program. Resolution E-4958 later directed the utilities to continue the MHP pilot program, subject to certain limitations, until the earlier date of December 31, 2021, or the issuance of a Commission decision for the continuation, expansion, or modification of the program. SCE considers its Pilot Program a success due to the achievement of the following performance indicators:

- **Program Participation**

The Program began on May 22, 2015, when SCE received a list of selected MHPs from the CPUC’s Safety and Enforcement Division (SED). Since that time, SCE has successfully partnered with MHP Owners/Operators to increase participation. From inception of the Program through December 31, 2019, SCE has successfully converted<sup>11</sup> approximately 11% of eligible mobilehome spaces in SCE’s service territory.

- **Safety Performance**

During the Program’s first four years, SCE maintained a high safety standard with five (5) reportable TTM contractor incident(s) and zero SCE employee incidents.

- **Improved safety and reliability of MHP electric distribution systems**

MHPs that participated in the program were provided a newly installed distribution system in compliance with current standards of all utility specifications and requirements. This system will provide safer and more reliable service to the MHP residents.

- **Increased access and availability to SCE customer programs and services**

Upon conversion of the MHP, residents have immediate access to SCE income-qualified and/or discount customer programs and services, such as California Alternate Rates for Energy (CARE), and Medical Baseline. Residents can also take advantage of time-of-use rates and/or energy-efficiency rebates, which can help them save energy and money on their electric bills. Additionally, customers can contact SCE’s customer service representatives with billing inquiries or to ask questions regarding other aspects of their utility service. MHP residents can also access SCE’s online

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<sup>11</sup> SCE understands 2018 conversion percentage reflects SED’s direction to define successfully converted as financially complete spaces of the original OIR total. Previous reporting defined successfully converted as cutover complete, thus, changing the threshold.

tools and services to monitor their energy usage directly and discover additional ways to save energy and money.

As of December 31, 2019, 5825 MHP residents of parks selected for utility upgrade were enrolled in SCE's CARE program and 171 were enrolled in SCE's Medical Baseline program.

**Appendix B**

**Declaration Supporting Confidential Designation on Behalf of Southern California Edison  
Company**

**DECLARATION SUPPORTING CONFIDENTIAL  
DESIGNATION ON BEHALF OF  
SOUTHERN CALIFORNIA EDISON COMPANY**

1. I, Greg Ferree, am the Vice President of Distribution at Southern California Edison Company (“SCE”), a California corporation.

My business office is located at:

Southern California Edison

3 Innovation Way

Pomona, Ca 91768

Email: [Greg.Ferree@sce.com](mailto:Greg.Ferree@sce.com)

2. I am making this declaration in accordance with the instructions set forth in California Public Utilities Commission (CPUC or Commission) Decision (D.) 17-09-023 and General Order (G.O) 66-D §3.4, which governs the submission of confidential documents to the Commission.
3. This declaration applies to the Mobile Home Park D.14-03-021.
4. Title and description of document(s): Confidential – Parks In Progress or Complete-2019-Columns B, C, D.xlsx – Excel.
5. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check

**Basis for Confidential Treatment**

**Where Confidential Information is located on the documents [page number, section, or field or portion that is confidential]**

Customer-specific data, customer energy usage, demand, demand reduction, loads, amounts of savings, billing data, customer financial information, customer credit ratings.

Protected under PUC Code § 8380, Civ. Code §§1798 *et seq.*; Gov't. Code §6254[c]; Decisions (D.) 14-05-016, D. 04-08-055, D.06-12-029.

Personally Identifiable Information (PII) that identifies or describes an individual (e.g. customer, contractor, or SCE employee), which may include home address or phone number; email address, Social Security Numbers and other Government Issued Identification Numbers such as Driver's License, or Passport numbers; education; financial matters; medical or employment history (not including SCE job titles); and statements attributed to the individual. Individual computer user names, passwords, security question answers and PINS.

Gov't Code Section § 6254[c]. See also, Gov't Code §§ 6254(a),(d),(k), 6254.7(d) Protected under Civ. Code §§1798 *et seq* and 15 U.S.C §§ 1681 *et seq*, General Order 77-M.

R1804018-  
CONFIDENTIAL -  
Parks In Progress or  
Complete-2019,  
Columns B, C, D.xlsx

R1804018-  
CONFIDENTIAL -  
Parks In Progress or  
Complete-2019,  
Columns B, C, D.pdf

SCE proprietary and trade secret information, intellectual property or competitive data (e.g., noncore competitive growth opportunities, pricing forecast, supply and demand forecast) and other commercial records including project specific calculations, project costs, equipment cost; market-sensitive data; nonpublic business plans and strategies; long-term fuel buying and hedging plans; price, load, or demand forecasts; power purchase agreements within three years of execution, etc.

Protected under Govt. Code §§6254(e) (i), (k), 6254.7 (d), 6254.15, 6255(a), 6276.44, Civ. Code §3426 *et seq.*; Evidence Code § 1060.

Corporate financial records and non-public financial information, including Tax Returns, Board Minutes, Non Public Company Financial Information.

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Protected under Gov't Code §6254.15, Gov't Code § 6254 (e), Gov't Code§ 6254.7(d), Evidence Code §1060. SEC Rules 10b-5, 10b-S-1, 10b5-2.

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Third-Party (Vendor) information, including vendor proprietary information such as Vendor Bid, Pricing Information and Vendor Proprietary Information subject to non-disclosure or confidentiality agreement, contract between the utility and third party vendors that contain confidentiality clauses.

(See Gov't Code §§6254(K), 6255(a) See, e.g., D.09-08-018, 2011 WL 660568)

Critical Energy Infrastructure and Cyber (CEII)-and Physical- Security Sensitive Security Information.

18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702, Protected under Gov't Code §§ 6254(e), 6255(a), 6 U.S.C. §132(5), 68 Fed. Reg, 9857

Privileged Attorney-Client Communications, Attorney-Work Product, and Pending Litigation Information (e.g., claims and investigation reports associated with Utility Incidents, Claims Reserve Information, Information related to potential and pending litigation of investigations)

Gov't Code §6254(k), Gov't Code §6276.04,Civil Code §954, Evidence Code § 950 *et seq.*

Other Basis

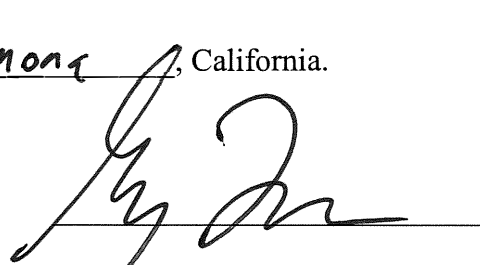
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6. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.



7. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

8. Executed on this 29<sup>th</sup> day of January, 2020 at Pomona, California.

A handwritten signature in black ink, appearing to read 'Greg Ferree', is written over a horizontal line.

Greg Ferree  
Vice President of Distribution  
Southern California Edison  
Company