

Energy Division Central Files Document Coversheet

Directions: Submit all documents and submittal questions to Energy Division Central Files via email EnergyDivisionCentralFiles@cpuc.ca.gov

1. Fill out coversheet completely. Coversheet can be embedded as page 1 of the electronic compliance filing, or can be submitted as a separate document that is attached to the email that delivers the compliance filing.
2. If the coversheet is submitted as separate document, please name the coversheet file with the same document name used in your primary document (see Section A) + plus the word "cov" (for coversheet). For example, the name of the coversheet file will be something like: **PacifiCorp Monthly Gas Report 201602 COV.docx**
3. If the document is confidential add CONF (for confidential). For example, the name of the coversheet file will be something like: **PacifiCorp Monthly Gas Report 201602 CONF.docx** and **PacifiCorp Monthly Gas Report 201602 COV CONF.docx**
4. All documents are required to be submitted in an electronically *searchable* format.
5. Documents need to reference the reason for the mandate that ordered the filing in Section B or C. If you are unable to reference a proceeding or explain the origin of your filing, please contact Energy Division Central Files.
6. To find a proceeding number (if you only have a decision number), go to <http://docs.cpuc.ca.gov/DecisionsSearchForm.aspx>; enter the decision number, and the results shown include the proceeding number.

A. Document Name

Today's Date: 2/1/2017

1. Utility Name: Liberty Utilities (CalPeco Electric) LLC
2. Document Submission Frequency (Annual, Semi-Annual, YTD, Quarterly, Monthly, Weekly, Ad-hoc, Once, Other Event): Annual
3. Report Name: Liberty CalPeco Second Annual Report on the Mobile Home Park Conversion Program
4. Reporting Interval (for this submission, e.g. 2015 Q1 – that data date): 2016
5. Document File Name (format as 1+2 + 3 + 4): Liberty CalPeco MHPC Program Annual Report 2017
6. Append the confidential and/or cover sheet notation, as appropriate. [Click here to enter text.](#)

Sample Document Names:

Utility Name + Submittal Frequency + Report Name + Year + Reporting Interval + (COV or CONF or both or neither)

<i>PacifiCorp Annual Procurement Report 2014</i>	<i>PacifiCorp Monthly Gas Report 201602 CONF</i>
<i>PacifiCorp Quarterly DR Forecast 2015Q1</i>	<i>PacifiCorp Daily Gas Report 20160230 COV</i>
<i>PacifiCorp Monthly Gas Report 201602</i>	<i>PacifiCorp Monthly Gas Report 201602 COV CONF</i>
<i>PacifiCorp Daily Gas Report 20160230</i>	

7. Identify whether this filing is original or revision to a previous filing.
 - a. If revision, identify date of the original filing: [Click here to enter text.](#)

B. Documents Related to a Proceeding

All submittals should reference both a proceeding and a decision, if applicable. If not applicable, leave blank and fill out Section C.

1. Proceeding Number (starts with R, I, C, A, or P plus 7 numbers): R1102018
2. Decision Number (starts with D plus 7 numbers): D1403021
3. Ordering Paragraph (OP) Number from the decision: 10 and 11

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C. Documents Submitted as Requested by Other Requirements

If the document submitted is in compliance with something other than a proceeding, (e.g. Resolution, Ruling, Staff Letter, Public Utilities Code, or sender's own motion), please explain: [Click here to enter text.](#)

D. Document Summary

Provide a Document Summary that explains why this report is being filed with the Energy Division. This information is often contained in the cover letter, introduction, or executive summary.

In accordance with California Public Utilities Commission Decision 14-03-021, Ordering Paragraphs 10 and 11, Liberty Utilities (CalPeco Electric) LLC (U-933-E) ("Liberty CalPeco") submits its second annual report on the program to convert master-metered mobile home parks to direct utility service.

E. Sender Contact Information

1. Sender Name: Diana Lemoli
2. Sender Organization: Liberty Utilities (CalPeco Electric) LLC
3. Sender Phone: 562-319-4708
4. Sender Email: diana.lemoli@libertyutilities.com

F. Confidentiality

1. Is this document confidential? No Yes
 - a. If Yes, provide an explanation of why confidentiality is claimed and identify the expiration of the confidentiality designation (e.g. Confidential until December 31, 2020.) [Click here to enter text.](#)

G. CPUC Routing

Energy Division's Director, Ed Randolph, requests that you not copy him on filings sent to Energy Division Central Files. Identify below any Commission staff that were copied on the submittal of this document.

1. Names of Commission staff that sender copied on the submittal of this Document: Timothy Sullivan, Michael Picker, Martha Guzman Aceves, Carla J. Peterman, Liane M. Randolph, Clifford Rechtschaffen, Karen Clopton, Elizaveta Malashenko, Sunil Shori

ver.5/19/2016



VIA OVERNIGHT DELIVERY

Liberty Utilities (CalPeco Electric) LLC (U 933-E)

February 1, 2017

Mr. Timothy Sullivan
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE: Liberty CalPeco Second Annual Report on the Mobile Home Park Conversion Program

In accordance with California Public Utilities Commission Decision 14-03-021, Ordering Paragraphs 10 and 11, Liberty Utilities (CalPeco Electric) LLC (U 933-E) ("Liberty CalPeco") submits its second annual report on the program to convert master-metered mobile home parks to direct utility service.

Please address all formal and informal correspondence and staff requests regarding this filing to:

Daniel W. Marsh
Manager, Rates and Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave
Tahoe Vista, CA 96148-9905
Email (preferred): Dan.Marsh@libertyutilities.com
Phone: (562)-299-5104

Verification

Pursuant to Decision 14-03-021, Ordering Paragraph 11 and Rule 1.11 of the California Public Utilities Commission's Rules of Practice and Procedure, I provide the following verification.

I, Jeanne-Marie Bruno, hereby declare that I am the President of Liberty Utilities (CalPeco Electric) LLC, I have read the accompanying document, and the information set forth therein is true and correct to the best of my knowledge, information and belief.

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

Executed this February 1, 2017.

/s/ Jeanne-Marie Bruno
Jeanne-Marie Bruno
President
Liberty Utilities (CalPeco Electric) LLC



Enclosure

cc: President Michael Picker, michael.picker@cpuc.ca.gov
Commissioner Martha Guzman Aceves, martha.guzman-aceves@cpuc.ca.gov
Commissioner Carla J. Peterman, carla.peterman@cpuc.ca.gov
Commissioner Liane M. Randolph, liane.randolph@cpuc.ca.gov
Commissioner Clifford Rechtschaffen, clifford.rechtschaffen@cpuc.ca.gov
Chief ALJ Karen Clopton, kvc@cpuc.ca.gov
Elizaveta Malashenko, Director, SED, elizaveta.malashenko@cpuc.ca.gov
Sunil Shori, Safety Enforcement Division, sunil.shori@cpuc.ca.gov



Liberty Utilities (CalPeco Electric) LLC (U 933E)
Mobilehome Park Conversion Program Second Annual Report
January 31, 2017

1. Introduction

In D. 14-03-021, the Commission approved a three-year pilot program to incentivize voluntary conversion of master-metered/sub-metered Mobilehome Parks and Manufactured Housing Communities (MHP) from a private distribution and service system to direct utility distribution and service system (MHP Program). Under the MHP Program, Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”) (electric) in concert with Southwest Gas Corporation (gas) is authorized to convert approximately 10 percent of the master-metered/sub metered MHP spaces within its service territory over a three-year period.

Pursuant to D.14-03-021, Ordering Paragraph 10, requires annual reports be prepared to confirm the utilities progress in implementing the pilot program. For the second required report, each utility is required to submit a status report due on or before February 1, 2017, that includes the following items:

- Progress along the Pilot implementation timeline and where the utility is on that timeline
- Preliminary assessment of construction costs incurred per space
 - To the meter
 - Beyond the meter
- Costs are broken out to identify:
 - Civil work/trenching
 - Electric system construction costs
 - Other costs (permits and easements)

2. Pilot Program Timeline

Liberty CalPeco has identified 5 different periods in the MHP Program timeline:

- FOI Submission- completed
 - Form of Intent (FOI) Submission Period- Liberty Utilities identified 8 parks that filled out the FOI.
- Park Prioritization Period - completed
 - The 2 parks (see below) were chosen by California Public Utilities Commission Safety Enforcement Division (SED), no other prioritization was necessary.
- Application Period - completed



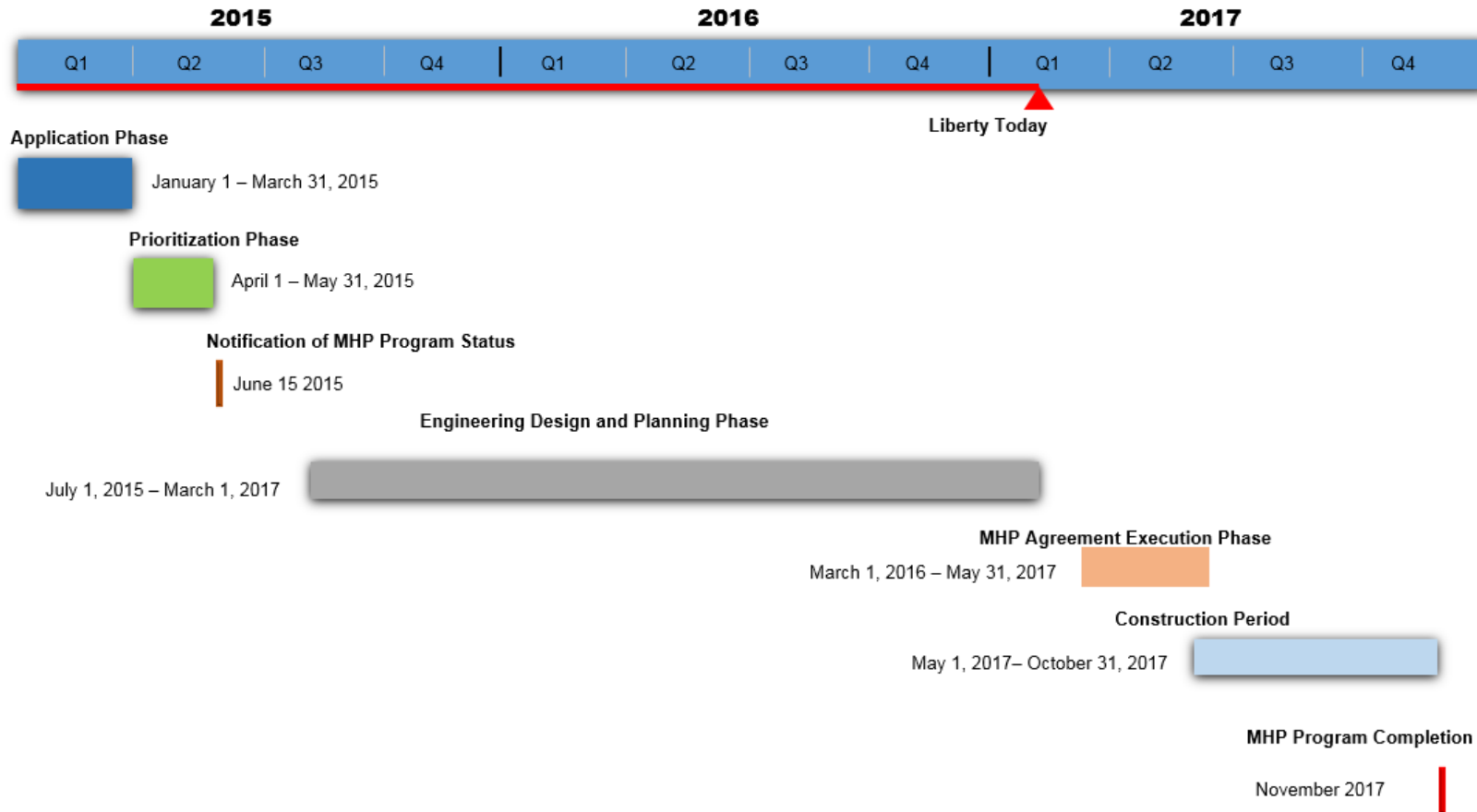
- The 2 parks completed and turned in applications.
- Agreement Period – in progress
 - Preliminary before-the-meter design work completed by Liberty CalPeco and Southwest Gas Corporation forwarded to the MHP owner February 2017
 - Beyond-the-meter Contractor selected by MHP owner – March 2017 (note: this has been an area with problems, the Lake Tahoe basin has a limited number of beyond the meter (BTM) contractors, many have commitments that do not allow them to work within the timeframe of the project) Currently, of the 2 MHPs one has chosen a BTM contractor and has passed the contractors name on to Liberty for review.
 - Preliminary beyond-the-meter design work completed by contractor – March-April 2017.
 - Meetings with MHP owner. - mid March-May 2017.
 - Meetings with MHP residents - late March-May 2017, (note: there were meetings with the park residents last summer in one of the Parks, but because the park owner was not able to procure BTM contractor, the ground work done at that time will have to be redone).
 - Creation of the MHP Agreement - signed by Liberty Utilities and the respective MHP owner – March thru May 2017
- Construction Period – not started – May thru October 2017.

3. Challenges and Obstacles

- As noted above, the number of BTM contractors in the Lake Tahoe Basin is limited and the times the contractors are available for the BTM project do not necessarily coincide with the times they would be needed.
- Working in partnership with Southwest Gas (SWG).
 - In Liberty CalPeco's case: Crew time committed to the project is limited because the company is small and Crews work on multiple projects concurrently. Liberty CalPeco, cannot speak for SWG but, Liberty CalPeco assumes that their Northern California/Nevada offices have the same problem.
- The building season in the Lake Tahoe Basin is limited (May to October). This year the building season may be even shorter due to the severity of the storms the Lake Tahoe Basin has received to date.



MHP Program Implementation Timeline



Total expense administrative costs for Pilot implementation	Total capital administrative costs for Pilot implementation	Total Pilot related costs since the issuance of Decision (14-03-021) thru December 31, 2016	Total costs related to Pilot outreach efforts	Total capital costs for Pilot related construction activity	Total expense costs for Pilot related construction activity	Other costs (along with a brief explanation of the types of costs included in the "other costs" category)	Grand Total
43,090.05	2,605.23		41,606.55	19,467.14			106,768.97

MHP Name	Mobilehome Park (MHP) HCD ID#	Number of Mobilehome Spaces Converted	Number of non-mobilehome Spaces Converted	Date when utility held MHP Open House Meeting (dd/mm/yyyy) or if no field meet then "ND"	Date when utility performed first field meet with MHP representatives (dd/mm/yyyy) or if no field meet then "ND"	Date Construction Started (dd/mm/yyyy) or "NA"	Date Construction Expected to be Completed (dd/mm/yyyy)	Date Construction Actually Completed (dd/mm/yyyy) or "Open" if the work is still underway	Date last space was connected to new direct served system (dd/mm/yyyy or "NA" or "Open")
Skylark Mobile Home Park	09-0032			7/15/2016	5/31/2016	NA	8/31/2017	Open	NA
Kings Beach Mobile Home Park	31-0009			ND	6/31/16	NA	10/31/2017	Open	NA
SUBTOTAL									
TOTAL									

MHP Name	Date gas purged from legacy system (dd/mm/yyyy or "NA" or "Open")	Total Reimbursable Capital Costs related to the MHP's Pilot Project	Total Reimbursable Expense Costs related to the MHP's Pilot Project	Total Non-reimbursable Capital Costs related to the MHP's Pilot Project	Total non-reimbursable Expense Costs related to the MHP's Pilot Project	Total Reimbursable TTM Capital Costs related to the MHP's Pilot Project	Percentage by which final non-reimbursable TTM Capital Costs exceeded original estimates	Total Reimbursable TTM Expense Costs related to the MHP's Pilot Project	Percentage by which final reimbursable TTM expenses exceeded original estimates	Total Non-reimbursable TTM Capital Costs related to the MHP's Pilot Project
Skylark Mobile Home Park	NA	15,655.46	42,348.30	NA	NA	15,655.46	NA	NA	NA	NA
Kings Beach Mobile Home Park	NA	6,416.91	42,348.30	NA	NA	6,416.91	NA	NA	NA	NA
SUBTOTAL		22,072.37	84,696.60			22,072.37				
TOTAL		106,768.97								

MHP Name	Percentage by which final non-reimbursable TTM Capital costs exceeded original estimates	Total non-reimbursable TTM Expense Costs related to the MHP's Pilot Project	Percentage by which final non-reimbursable TTM expenses exceeded original estimates	Total Reimbursable BTM Capital Costs related to the MHP's Pilot Project	Percentage by which final non-reimbursable BTM Capital Costs exceeded original estimates	Total Reimbursable BTM Expense Costs related to the MHP's Pilot Project	Percentage by which final reimbursable BTM expenses exceeded original estimates	Total Non-reimbursable BTM Capital Costs related to the MHP's Pilot Project	Percentage by which final non-reimbursable BTM Capital costs exceeded original estimates	Total non-reimbursable BTM Expense Costs related to the MHP's Pilot Project
Skylark Mobile Home Park	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Kings Beach Mobile Home Park	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SUBTOTAL										
TOTAL										

MHP Name	Percentage by which final non-reimbursable BTM expenses exceeded original estimates	Estimated total reimbursable HCD Permit costs	Actual total reimbursable HCD Permit costs	Details on why actual TTM Capital Costs exceeded original estimates. If actuals did not exceed original estimates, then enter "NA"	Details on why actual TTM Expense Costs exceeded original estimates. If actuals did not exceed original estimates, then enter "NA"	Details on why BTM Capital Costs exceeded original estimates. If actuals did not exceed original estimates, then enter "NA"	Details on why BTM Expense Costs exceeded original estimates. If actuals did not exceed original estimates, then enter "NA"
Skylark Mobile Home Park	NA	NA	NA	NA	NA	NA	NA
Kings Beach Mobile Home Park	NA	NA	NA	NA	NA	NA	NA
SUBTOTAL							
TOTAL							