

**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, 2018)
IN COMPLIANCE WITH D.14-03-021**

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Dated: February 1, 2019

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Southern California Edison Company (SCE) hereby timely submits its fourth 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.¹ SCE’s annual MHP report for the period of January 1 to December 31, 2018, 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.² Resolution E-4878, issued on September 28, 2017, directed the utilities to continue the MHP pilot program until the earlier

¹ SCE’s first annual report was served on February 1, 2016.

² D.14-03-021, OP 2.

date of December 31, 2019, or the issuance of a Commission decision for the continuation, expansion, or modification of the program.³

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, 2018.⁴ 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 Ordering Paragraph 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's 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.

³ Resolution E-4878, OP 7.

⁴ 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,

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/s/ Andrea Tozer

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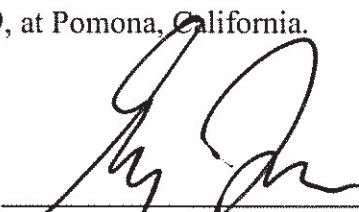
February 1, 2019

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 24, 2019, at Pomona, California.



By: Greg Ferree
Vice President of Distribution

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Appendix A

**SCE Mobile Home Park Utility Conversion Pilot Program Annual Report
(For the Period January 1 to December 31, 2018) 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 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 Decision 14-03-021 (approximately 10% 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.”⁵

Ordering Paragraph 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. SCE filed its first, second, and third status reports on February 1, 2016, February 1, 2017, and February 1, 2018, respectively. 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.

From inception of the Program through December 31, 2018, SCE has converted 171 MHPs with a combined total of 9050 spaces. The total conversion cost for these MHPs is \$133,604,580 resulting in a current average per-space cost of \$14,763.

⁵ Resolution E-4878, OP 2.

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% 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% of the MHP spaces by December 31, 2019, or the issuance of a Commission Decision to continue, expand or modify the MHP Program.⁶

Since inception of the Program, SCE has experienced MHP drop-out of 63 parks and 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, 2018, SCE has completed 274 MHP designs and converted 171 MHPs, with 22 MHPs under construction. SCE plans to complete all qualified Program and a majority of Program extension work in 2019.

⁶ Resolution E-4878 OP2 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, 2018, SCE had fully converted 171 MHPs with a combined total of 9,050 spaces. SCE considers an MHP to be “Converted” after System Cutover has occurred, master meter removed, and all financial obligations have been fulfilled. In accordance with Ordering Paragraph 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% 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% of the MHP spaces by December 31, 2019, or the issuance of a Commission Decision to continue, expand or modify the MHP 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, 2018, SCE has successfully converted⁷ approximately 9% 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 0 reportable incident(s) between contractors and employees combined.

- **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 customer programs and services, such as CARE, FERA, 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 tools and services to monitor their energy usage directly and discover additional ways to save energy and money.

As of December 31, 2018, 4,831 MHP residents were enrolled in SCE’s CARE program and 113 were enrolled in SCE’s Medical Baseline program.

⁷ 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.