

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



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

Rulemaking 18-04-018 R1804018
(Filed April 26, 2018)

**OPENING COMMENTS OF VERMONT ENERGY INVESTMENT CORPORATION
TO THE PROPOSED DECISION ESTABLISHING AN ELECTRIFICATION PILOT
INITIATIVE FOR MOBILE HOME PARKS**

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Dated November 6, 2025

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I. Introduction

Vermont Energy Investment Corporation (“VEIC”) respectfully submits these comments on the *Proposed Decision Establishing an Electrification Pilot Initiative for Mobile Home Parks* issued October 17, 2025 (“Proposed Decision”). VEIC is a member of the program administration and implementation team for the Northern California Equitable Building Decarbonization (“EBD”) Direct Install Program, a statewide direct installation incentive program of the California Energy Commission (“CEC”) providing decarbonization retrofits to low- and moderate-income households. VEIC is also a member of the program administrator team for TECH Clean California (“TECH”) and the CalNEXT statewide emerging technologies program (“CalNEXT”), and leverages experience engaged with mobile and manufactured housing through both of those programs in our comments. VEIC’s comments are informed by these experiences but are submitted on behalf of VEIC – and do not represent the perspective of the CEC or EBD program as a whole¹.

II. Responses to Proposed Decision

¹ VEIC is the program administration and implementation team member responsible for leading the mobile and manufactured homes (“MMH”) component of the Northern California (“NorCal”) EBD program and these comments are not provided on behalf of the CEC or the EBD program as a whole.

- 1. VEIC recommends that the Commission clarify the definition of “To-the-Meter” (TTM) relative to “Behind-the-Meter” (BTM) and explicitly delineate responsibilities between the EBD program and IOU programs for serving Mobile Home Parks (MHP). VEIC recommends that TTM costs and scope of work include a main panel served via an electric service pedestal, as well as the feeder cable connecting the main panel to an individual mobile home, to enable broadened EBD coverage of full-electrification “Behind-the-Meter” (BTM).**

Current Commission Guidance

In the Commission’s Final Decision 24-12-037 in R.18-04-018, issued December 24, 2024, the Commission stated that:

- “Utilities will continue to cover the TTM costs of upgrading common use facilities’ electric and gas infrastructure, but the MHP owner will remain responsible for any BTM upgrades and costs for these facilities” (page 17).
- "TTM infrastructure includes all components of the distribution system within the MHP, including but not limited to transformers, distribution cables, conduit for the cables, splice boxes, and the electric meter used to measure a home’s electricity usage” (page 7).
- “In the context of the MHP UCP [Utility Conversion Program], BTM infrastructure includes everything beyond the meter and up to and including the point of connection to the manufactured home. This includes the electrical pedestal where the meter is installed, conduit and cables leading from the pedestal to the manufactured home, and the junction box, which hold the electrical connections into the manufactured home" (page 7).

Mobile Home Retrofit Context

Within a Mobile Home Park, it is common to have a main electrical panel that is stationed on a service pedestal, with feeder cables or conductors connecting that main panel to sub-panels inside an individual home.² This creates a unique dynamic in mobile home parks, where main panel upgrades are less clearly a “BTM” upgrade attributed to an individual home.

Justification for UCP to Cover Main Panel and Feeder Cables or Conductors

The definition of TTM measures should include all to-the-household costs, inclusive of upgrades made to the main panel and feeder cables, for the following reasons:

- I. Neat Package To-The-Household or To-The-Device
 - a. Given the unique configuration oftentimes seen in mobile home parks of electric service pedestals and sub-panels serving individual households, a “neat” electrical package that excludes in-home retrofit needs would include main panel upgrades and feeder cable or conduit upgrades.
 - b. Under Docket 22-DECARB-03, EBD's responsibility for electrical work is outlined to include “electrical wiring and panel upsizing” to support building electrification. It specifically covers “upgrades and new wiring needed to enable full electrification of the building”. However, it “excludes upgrades on the utility side of the meter and distribution system upgrades, which are ineligible for program funding”.³ This creates a potential justification for the TTM costs to include electrical work “to the device”, or “to the home” as a neat and

² For reference, see for example: [052521-Electrical Service Requirements for Mobile Home Developments](#)

³ See: EBD Program Guidelines, page 16.

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=252682&DocumentContentId=87762>

comprehensive electrical package to be funded by, and covered by contractors serving, the MHP program.

II. Cost Burden and Budget Impact for EBD Program

- a. While the EBD Program is not designed to fund full home electrification within each home that it serves, the program intends to fund full BTM electrification for homes participating in the MHP Electrification Pilot. This commitment will significantly increase the per-project cost for the EBD program, resulting in higher costs for the parks included in this pilot. The current 5% set-aside for Mobile and Manufactured Housing (MMH) within the EBD program could easily be entirely allocated – if not exceeded – by partnering with the CPUC MHP Electrification Pilot. For context, the total 5% MMH set-aside for the Northern California region is approximately \$4 million at present, excluding pending federal funding. Using the CPUC Staff Proposal’s estimated cost of \$33,800 per MMH participant to participate in this pilot, a combined total of TTM and BTM costs, equates to an estimated 118 individual MMH households treated. By comparison, there are an estimated 16,000 occupied MMH households within the NorCal preliminary Initial Community Focus Areas, out of 122,532 in total in the NorCal region.
- b. To preserve funding capacity within the EBD Program budget, VEIC requests that the CPUC UCP initiative and IOUs be responsible for all costs TTM inclusive of to-the-household or to-the-device for parks participating in this Pilot. This could include most or all electrical infrastructure (service drop, meter, wire to the panel, panel, wire to the outlet/device), creating a streamlined scope of work delivered

by one contractor and funded by one source. Under this approach, the EBD Program would remain responsible for appliances ("devices") and the associated installation costs.

At a minimum, VEIC requests that the Final Decision explicitly clarify and expand upon Decision 24-12-037 to state that everything leading up to the in-home sub-panel, inclusive of the feeder cables from the electrical service pedestal, is included in the TTM definition for the purposes of the UCP Electrification Pilot. This clarification ensures these components are recognized as the responsibility of the IOUs and CPUC funding under the UCP. Importantly, the Final Decision should also clearly define contractor responsibilities for each scope of work — IOU contractors participating in the UCP program versus EBD program contractors.

2. VEIC recommends that the Final Decision specify the process by which eligible parks for the MHP Electrification Pilot, once identified by EBD, will be prioritized and served by the UCP program.

It is VEIC's understanding that the UCP program currently maintains a long waitlist of parks interested in participating in the UCP program. To ensure alignment and timely implementation, VEIC asks the CPUC to clarify and state explicitly in the Final Decision that:

- I. MHP Electrification Pilot and EBD-eligible MHPs, once identified and vetted by the EBD program, move to the front of the UCP queue for service. This prioritization is critical to ensure these parks are served on the same timeline as the EBD program and to prevent the UCP program's budget from being fully allocated before these parks can participate.

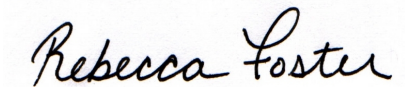
II. The CPUC will provide, and IOUs will be required to provide, the EBD program with robust data on eligible MHPs for the UCP program, including current waitlists and parks that have indicated existing interest in participation

III. Conclusion

VEIC appreciates the opportunity to submit comments on this proceeding. We are committed to sharing key insights from across our program work in California to help inform the CPUC's decisions and advance building decarbonization in California.

Dated November 6, 2025

Respectfully submitted,

A handwritten signature in black ink that reads "Rebecca Foster". The signature is written in a cursive, flowing style.

/s/
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