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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Evaluate the Mobile-home Park Pilot Program and to Adopt Programmatic Modifications.	Rulemaking 18-04-018

ASSIGNED COMMISSIONER'S SECOND AMENDED PHASE 2 SCOPING MEMO AND RULING

This scoping memo and ruling amends the issues in Phase 2 of this proceeding, sets a schedule for the remaining issue in scope, requests party comments on the attached Staff Proposal, and admits the Staff Proposal into the proceeding record. Opening comments on this ruling are due no later than three weeks from the issuance of this ruling, and reply comments are due no later than five weeks from the issuance of this ruling.

1. Procedural Background

On April 26, 2018, the Commission initiated Rulemaking (R.) 18-04-018 to evaluate the Mobile Home Park (MHP) Pilot Program. On March 14, 2019, Resolution E-4958 extended the MHP Pilot Program to December 31, 2021, to give the Commission time to adopt a decision in R.18-04-018 prior to formally closing the pilot program. On April 16, 2020, the Commission adopted Decision (D.) 20-04-004 establishing a ten-year MHP Utility Conversion Program.

On December 23, 2020, the assigned Commissioner issued a Scoping Memo and Ruling (Scoping Ruling) for Phase 2 of R.18-04-018 to (1) address consumer protections, (2) establish an electric service standard for electrification readiness, and (3) develop a pilot exploring the full electrification of selected

MHPs. On February 12, 2021, the assigned Administrative Law Judge (ALJ) issued a ruling on consumer protections with an accompanying staff proposal. On August 19, 2021, the Commission approved D.21-08-025 adopting consumer protection measures for MHP residents. On July 31, 2023, the assigned ALJ issued a ruling on all remaining Phase 2 issues along with another accompanying staff proposal (2023 Staff Proposal), which explored an electrification-readiness electric service standard and potential MHP electrification pilot. Parties filed opening comments to the ruling and 2023 Staff Proposal on August 25, 2023, and reply comments on September 22, 2023.

A follow-up ruling was issued on September 10, 2024, directing parties to file comments on proposed MHP Pilot Program Evaluation Criteria. On December 19, 2024, the Commission approved D.24-12-037 adopting a 200-amp service standard for future MHP conversions and final MHP Pilot Program Evaluation Criteria.

The assigned Commissioner issued an amended Scoping Ruling for Phase 2 on September 15, 2025, adding to the scope of issues whether the Commission should modify the direction set forth in D.20-04-004 regarding the MHP Utility Conversion Program (UCP) mid-cycle evaluation.

The Commission subsequently issued D.25-11-009 on November 12, 2025, which ordered the establishment of an electrification initiative alongside the MHP Program. Southern California Gas Company filed an application for rehearing on December 23, 2025. The Commission granted that rehearing and suspended D.25-11-009 via D.26-06-032, issued on June 11, 2026.

2. Issues

This second amended scoping ruling adds the following to the scope of issues for Phase 2:

Whether the Commission should authorize a pilot initiative to electrify selected mobilehome parks, and if so, how should the pilot initiative be designed and implemented. Design and implementation issues related to the authorization of a potential electrification pilot, include but are not limited to:

- How the pilot should be funded;
- How utility costs should be recovered;
- Who must consent to end a gas utility's obligation to serve an MHP participating in the electrification pilot initiative;
- Whether the Commission should impose a covenant or other requirement on MHPs that participate in the electrification initiative to prohibit the reinstallation of gas infrastructure or appliances for a set period of time after electrification of the park; and
- Other issues set forth in the attached Staff Proposal.

This amended scoping ruling makes no other changes to the scope of Phase 2.

3. Schedule

The Scoping Ruling adopts the following schedule for addressing the remaining issues in the scope of Phase 2 of this rulemaking:

Event	Date
Opening Comments on This Scoping Ruling	No later than three weeks from the issuance of this ruling
Reply Comments on This Scoping Ruling (Matter Submitted)	No later than five weeks from the issuance of this ruling
Proposed Decision	Within 90 days after submission.
Commission Decision	No sooner than 30 days after the Proposed Decision.

4. Staff Proposal

This Scoping Ruling admits the R.18-04-018 MHP Electrification Staff Proposal (Staff Proposal), dated October 1, 2026, and attached as Appendix 1 into the proceeding record of this proceeding.

5. Questions for Party Comments

This Scoping Ruling requests party comments on the attached Staff Proposal for a mobilehome electrification pilot initiative. Parties shall organize their opening and reply comments so that each response corresponds directly to the ten numbered sections below.

1. **Obligation to Serve and Prohibition on Reinstallation**
   a. The Staff Proposal asserts that only the master-metered customer of the MHP (generally the MHP owner) must consent to end obligation to serve of the gas utility for the MHP for an electrification initiative project to move forward, as the master-metered customer is the only direct customer of the Investor-Owned Utility (IOU). Since only the master-metered customer is a direct customer of the IOU, the sub-metered customers' consent is not required to terminate the gas utility's obligation to serve the MHP. Do you agree with this assertion? Why or why not?
      i. If you do not agree, what approach do you recommend for the pilot to address the obligation to serve?
      ii. Are there any other factors the Commission should consider related to obligation to serve for an electrification initiative?
   b. Should the Commission impose a covenant or other requirement on MHPs that participate in the electrification initiative to prohibit the reinstallation of gas infrastructure or appliances for a set period of time after electrification of the park? Why or why not?
      i. What duration of time would be most appropriate for such a covenant or other mechanism and why?

ii. Please identify any barriers or considerations for imposing such a covenant or other mechanism.

2. **Eligibility and Selection Criteria**
   a. The MHP Program is only open to MHPs with master-metered electric and gas systems and converts them to direct-metered service. Should the electrification pilot be open to MHPs that already have direct-metered gas service, in addition to those with master-metered gas service? Why or why not?
      i. Please identify any barriers or considerations for limiting eligibility for the electrification pilot to MHPs that only have master-metered electric and gas systems.
      ii. Please identify any barriers or considerations for extending eligibility for the electrification pilot to MHPs that already have direct-metered gas service.
   b. The Staff Proposal recommends that the Commission not add additional criteria for MHP eligibility for the electrification initiative beyond that already included in the existing criteria of the MHP Program and California Energy Commission (CEC) Equitable Building Decarbonization (EBD) Program, to avoid overly narrowing the eligibility list for the initiative. Are the selection criteria of the MHP Program and EBD Program sufficient to establish the electrification pilot? Why or why not?
      i. Are there any additional criteria or methodologies that should be considered to narrow or prioritize eligible MHPs?
   c. The Staff Proposal recommends that the MHP electrification initiative work cooperatively with the CEC EBD Program to implement the electrification initiative. When selecting candidate MHPs for the electrification initiative, how should roles and responsibilities be divided amongst Commission Energy Division staff, the large electric IOUs, large gas IOUs, CEC EBD Program staff, and EBD regional administrators?
3. **Outreach and Education**

a. When conducting outreach and education for the electrification initiative, how should roles and responsibilities be divided amongst Commission Energy Division staff, the large electric IOUs, large gas IOUs, CEC EBD Program staff, and EBD regional administrators?

b. What best practices and minimum criteria should be followed for park owner and resident outreach and education for the electrification pilot?

4. **Installation and Remediation**
   a. In implementing the electrification initiative, including installation and remediation, how should roles and responsibilities be divided amongst Commission Energy Division staff, the large electric IOUs, large gas IOUs, CEC EBD Program staff, and EBD regional administrators?

5. **Cost Estimates**
   a. The Staff Proposal cites cost estimates from 2019 for mobile and manufactured home electrification retrofits (see Table 5, p. 29). Are these costs still accurate? If not please provide what you believe to be more accurate numbers. Please cite any sources, methodologies, and/or assumptions utilized to develop updated cost estimates.

   b. The Staff Proposal assumes an average cost of $5,431 per coach for remediation for the electrification pilot. The EBD Program utilizes a maximum average cost of $7,200 per home for electrical and remediation measures for MHPs.

      i. Are these cost estimates appropriate? Why or why not?

         1. Please describe any data sources, methodologies, and/or assumptions utilized if providing an alternate estimated average cost.

6. **Funding and Cost Recovery**
   a. In addition to the non-ratepayer funding sources identified in the Staff Proposal for the electrification initiative, are there other potential funding sources or existing programs that the Commission should consider leveraging as part of the electrification initiative, whether for Behind-the-meter (BTM),

To-the-meter (TTM), remediation, or other work identified as part of MHP whole-home electrification?

b. The Staff Proposal recommends that the large gas IOUs should record and recover costs for gas system decommissioning in MHPs selected by the electrification initiative with IOU-operated gas service as they do for parks in the MHP Program. Is this a reasonable approach to cost recovery for gas decommissioning in the electrification initiative? Why or why not?

    i. If not, what approach do you recommend for cost recovery for gas decommissioning in the electrification initiative?

c. Should IOU ratepayers supplement the amount provided by the EBD Program for MHP remediation? Why or why not?

    i. If so, for what specific remediation actions and how much?

7. **Tenant Protections**

a. In addition to aligning with the tenant protection measures of the existing MHP Program and EBD Program, the Staff Proposal recommends that IOUs be required to align with the tenant protections adopted by the Technology and Equipment for Clean Housing (TECH) Program. Is this an appropriate requirement? Why or why not?

    i. Are there specific components of the TECH tenant protections that should be included or excluded? Why?

8. **Bill Protection**

a. The current Staff Proposal, as opposed to the 2023 Staff Proposal, no longer recommends bill protections as part of the electrification initiative, citing the recent Base Services Charge decision as changing the cost of electricity, especially for low-income households. Do you agree with this assertion? Why or why not?

b. What minimum criteria should be included when communicating potential bill impacts of electrification to MHP residents?

    i. The Staff Proposal recommends that IOUs lead outreach to customers on potential bill impacts, in coordination with

EBD Program staff and EBD Regional Administrators. Who should be responsible for communicating potential bill impacts with the customer and why?

9. **Reporting and Evaluation**
   a. The Staff Proposal recommends that an independent evaluator be contracted to conduct the final program evaluation for the MHP Program and the electrification initiative contract to support a uniform statewide assessment of both programs. Should this evaluation be conducted by an independent evaluator? Why or why not?
      i. If not, please suggest an alternate approach.
   b. The Staff Proposal recommends that costs for the independent evaluator to conduct the end-of-program evaluation be reimbursed to the CPUC proportionally by the large IOUs (PG&E, SCE, SDG&E, and SoCalGas) based on the number of completed MHP Program projects through the calendar year 2025. Is this an appropriate method for division of costs for the end-of-program evaluation? Why or why not?
      i. Is there an alternate calendar year or metric that should be utilized to divide evaluation costs? Please justify any suggested alternate approach.
      ii. The Staff Proposal also asserts that while large gas-only IOUs, specifically SoCalGas, would not have MHP electrification projects to evaluate within the electrification initiative, the final evaluation of the electrification initiative would examine costs and impacts of decommissioning gas infrastructure belonging to large gas IOUs, including SoCalGas, in MHPs that participate in the electrification initiative. Therefore, the electrification initiative end-of-program evaluation remains relevant to both electric and gas ratepayers. Do you agree with this assertion? Why or why not?
      iii. Are there any reasons that large gas IOUs should not contribute to reimbursement costs for the independent evaluator?

10. **General Comments**
    a. Are there any other comments on the Staff Proposal not covered by the questions above?

IT IS RULED that:

1. The scope of Phase 2 of this proceeding is amended as described above.
2. The schedule of this proceeding is set forth above and is adopted.
    a. Parties may file opening comments on this ruling no later than three weeks from the issuance of this ruling, and reply comments no later than five weeks from the issuance of this ruling.

Dated October 1, 2026, at San Francisco, California.

/s/ KAREN DOUGLAS
Karen Douglas
Assigned Commissioner