

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

Item No: 8
Agenda ID: 19405
RESOLUTION E-5070
May 20, 2021

R E S O L U T I O N

Resolution E-5070. Pacific Gas and Electric Company (PG&E) requests authorization to establish a Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) for mobilehome park (MHP) owners and operators in Butte County.

PROPOSED OUTCOME:

- This Resolution approves the Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) with modifications for MHP owners and operators in Butte County.

SAFETY CONSIDERATIONS:

- The Butte County Mobilehome Park Rebuild Program will increase the safety of MHPs for their residents in Butte County.

ESTIMATED COST:

- The total expenditure for the Butte County Mobilehome Park Rebuild Program (Rebuild Program) from 2019 through 2023 is anticipated to be approximately \$68,066,426.69.¹ PG&E has not indicated whether it will seek rate recovery for these costs.

By Advice Letter (AL) 4116-G/5581-E, filed on July 2, 2019.

¹ PG&E expects a total expenditure of \$68,066,426.69 and estimates that an additional \$96,789 will be the maximum expenditure required to provide underground cable rated to serve a minimum of 200 amps from the splice boxes to the electric pedestal of each mobilehome. Please note that PG&E still requires other electric infrastructure upgrades besides the 200 amp service cable if it were to provide 200 amp service to all residences in a mobilehome park (MHP).

SUMMARY

Pacific Gas and Electric Company (PG&E) requests approval to establish a Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) for MHP owners and operators in Butte County. This Resolution approves that request with the following modifications in response to protests and to align with Decision 20-04-004.

1. This Resolution adopts the following proposals that were put forth by the protests to Advice Letter (AL) 4116-G/5581-E:
 - a) PG&E shall have discretion to place electric and gas utility routes according to the needs of this program and is not required to place them in the streets. PG&E shall take into consideration the most economic, convenient, and efficient service route in which utilities could be better positioned with respect to the mobile homes, considering the park's other constraints, and away from the street.
 - b) PG&E shall develop a strategy to avoid service routes that might damage salvageable non-energy utilities, such as by crossing septic system leach fields. PG&E shall implement the minimum measures as discussed under the heading "*Damage to Existing Salvageable Utilities and Underground Facilities*" in the Discussion section of this resolution.
 - c) Section 6.5.4 of the Butte County Mobilehome Park Rebuild Program Agreement shall be revised to read: "PG&E shall not remove the existing legacy system owned by the MHPs and the system shall be abandoned in place unless removal is necessary and the MHP owner's permission has been obtained. PG&E shall ensure that the new and the existing legacy systems are both electrically and physically isolated from each other. PG&E shall not incur any expenses associated with the removal or retirement of the existing system owned by the MHP owners under the MHP Rebuild program. Should removal of the legacy distribution system owned by the MHP owners be necessary to complete the MHP Rebuild program, such costs may at PG&E's discretion be included in the MHP Rebuild Program if it is necessary and can be done so efficiently."
 - d) PG&E shall remove section 9.1.1.3 of the Butte County Mobilehome Park Rebuild Program Agreement which currently reads: "The failure or inability of the MHP Owner/Operator to complete the work and be ready to receive service from PG&E within twelve (12) months of the execution of this Agreement; or".

2. PG&E shall revise section 10.6 of the Butte County Mobilehome Park Rebuild Program Agreement to clearly show that beyond-the-meter work is not reimbursable except for installation of the electric pedestal. Given the ability to complete the gas meter and electrical pedestal work ahead of mobilehome repopulation, the Rebuild Program does not need to be extended for a decade or more.
3. The Butte County Mobilehome Park Rebuild Program Agreement shall require each participating MHP owner who operates on leased real property to submit proof of a valid lease for a minimum of 20 years from the date that the Butte County Mobilehome Park Rebuild Program Agreement is executed by PG&E.
4. PG&E shall include all applicable changes of the Mobilehome Park Utility Upgrade Program Agreement (Form 79-1165) specified in D.20-04-004 of Rulemaking (R.)18-04-018² in the Mobilehome Park Rebuild Program Agreement (Gas and Electric Sample Form 79-1201) as discussed under the heading "*Alignment with the MHP Decision (D.) 20-04-004*" in the "Discussion" section of this resolution.
5. PG&E shall extend to-the-meter eligibility to common use buildings and permanent fixed foundation residential structures.³
6. PG&E shall not extend to-the-meter eligibility to recreational vehicle (RV) spaces.⁴
7. PG&E shall provide underground service cable⁵ and conduit rated to serve a minimum of 200 amperes (amps) from the splice boxes⁶ to the electric pedestal of each mobilehome and update the Mobilehome Park Rebuild Program Agreement to reflect this requirement.
8. PG&E shall evaluate the maximum number of 200 amp services that can be supported by the contemplated transformer and distribution infrastructure,

² R.18-04-018: "Order Instituting Rulemaking to Evaluate the Mobilehome Park Pilot Program and to Adopt Programmatic Modifications".

³ Common use buildings include laundry, park office, community hall, and clubhouse buildings as defined in D.20-04-004 at 43.

⁴ D.20-04-004 at 43

⁵ A service cable runs from a splice box to the electric pedestal of a mobilehome.

⁶ An electrical splice box, also known as a junction box, enclose wire connections. It helps protecting against short circuits.

work with MHP owners and operators to the extent feasible to identify which spaces shall receive a 200 amp service, and allow for the installation of 200 amp rated pedestals and configuration of the secondary distribution system according to Rule 2 and Rule 16 to those spaces, to the extent feasible.⁷

9. PG&E shall evaluate whether upgrades to the secondary distribution system would enable a greater number of 200 amp services without necessitating a transformer upgrade. If determined feasible PG&E shall present options and with project costs to the MHP Owner and discuss in the annual reports.
10. PG&E shall continue to notify and coordinate with primary jurisdiction (*e.g.*, city or county) and non-energy service providers who serve MHPs scheduled for utility rebuild and who could participate in installing or upgrading their facilities in conjunction with the Rebuild Program work. Coordination should be performed in a manner which benefits CPUC regulated gas and/or electric utility customers.
11. PG&E is not required to retrofit construction in progress as of the effective date of this resolution or mobilehome parks completed through the Rebuild Program to satisfy the requirements set forth in this Resolution.
12. PG&E shall use the template in Table 1 of Appendix A to report to-the-meter and beyond-the-meter data of the Rebuild Program. Both public and confidential versions of the annual report shall be submitted to Energy Division (ED) and Safety and Enforcement Division (SED) on March 1st of each year until the closing of the Rebuild Program.
13. PG&E shall submit a Tier 1 supplemental compliance Advice Letter within 30 days of the effective date of this Resolution for approval of the updated Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) in accordance with the requirements set forth in this Resolution.

⁷ PG&E also indicated in its reply to protest that “if the MHP was previously served at 100-amp service, the MHP owner/ operator would need to submit an application for a service upgrade under Rule 3 with a request to increase the panel size meeting requirements under Rule 2 and Rule 16.” Rule 16 work may be performed by PG&E or a MHP contractor.

As this resolution responds to a Tier 2 Advice Letter filing, it does not grant any authority to track the Rebuild Program expenditures within existing memoranda accounts or to establish any new memoranda accounts.⁸

PG&E began rebuilding of the MHPs in Butte County in 2019 with the proposed Mobilehome Park (MHP) Rebuild Program Agreement. Therefore, the timeframe for the issuance of this Resolution has not delayed or interfered with PG&E's ability to expeditiously rebuild infrastructure to serve the community after the fire. Furthermore, this Resolution will support the rebuild effort with a modified agreement which addresses comments, includes minor enhancements to prepare for electrification, and aligns with requirements in Decision (D.) 20-04-004.

BACKGROUND

The Camp Fire started on November 8, 2018, lasted 17 days, and caused significant damage to infrastructure in Butte County. Since April 2019, PG&E has been working towards restoring services for MHP facilities that were damaged or destroyed by the Camp Fire. As part of these efforts, PG&E has created the Rebuild Program) specifically for MHPs affected by the Camp Fire. The Rebuild Program is intended to expedite the reestablishment of utility service to the MHPs in Butte County and provide direct utility service to the individual mobilehomes. Direct utility service refers to electric and gas services from PG&E that serve utility owned meters in each mobilehome space. This program is

⁸ General Rule 5.1 of GO 96-B (Matters Appropriate to Advice Letters) provides that a utility may request relief by advice letter where the utility "has been authorized or required by statute, by this General Order, or by other Commission order, to seek the requested relief by means of an advice letter." General Rule 5.2 of GO 96-B provides that a utility must file an application where the proposed action "has not been authorized, by statute, by this General Order, or by other Commission order." However, GO 96-B, General Rule 1.2 allows the Commission to authorize an exception to the operation of the General Order where appropriate. For example, Decision 14-12-028 for Application 09-04-006 has granted a waiver to request establishment of a memorandum account through a Tier 3 Advice Letter.

fashioned after the Mobilehome Park Utility Upgrade Program (MHP Pilot)⁹. The MHP Pilot is the predecessor to the permanent Mobilehome Park Utility Conversion Program (MHP Conversion Program) established by D.20-04-004. Both the MHP Pilot and MHP Conversion Program provide direct utility service to mobilehome spaces.

Under direct utility service, the mobilehome owners or residents become PG&E's customers. Before the conversion to direct utility service provided by the Rebuild Program, approximately 38% of the electric mobilehome spaces and 52% of the gas spaces were served by master-meters with the MHP owners and operators being PG&E's customer of record.¹⁰ Service would then be provided to the mobilehomes by the owner and operator with or without a submeter at the mobilehome, and the tenant would be charged for the power by the MHP owner and operator according to metered or assumed usage. Once MHP residents are provided direct utility service, they become PG&E customers. As PG&E customers, they can more easily participate in low-income programs such as CARE (California Alternate Rates for Energy), FERA (Family Electric Rate Assistance), and Medical Baseline. This direct eligibility has the potential to make the cost of gas and electric services more affordable for eligible MHP residents.¹¹

⁹ The Mobile Home Park Utility Upgrade Pilot Program (MHP Pilot) was established in Decision (D.)14-03-021 in 2014 as a three-year pilot program (2015-2017) to convert 10% of MHPs and manufactured housing communities (collectively, MHPs) to direct utility service. The CPUC extended the MHP Pilot by Resolution E-4878 and Resolution E-4958 to the earlier date of either December 31, 2021, or the issuance of a CPUC Decision for the continuation, expansion, or modification of the program beyond December 31, 2020. The CPUC opened Rulemaking (R.) 18-04-018 to establish criteria for evaluating the effectiveness of the MHP Pilot and consider whether a permanent program should be adopted. In April of 2020, D.20-04-004 established a permanent Mobilehome Park Utility Conversion Program (MHP Conversion Program).

¹⁰ PG&E has indicated in a data response to Energy Division on 11/18/20, that 1) there are 5 MHPs that have gas master meters, of the 5 MHPs, 3 are directly metered for electric and 2 are partially master-metered/direct-metered for electric; 2) there are 5 other MHPs that are partially master-metered/direct-metered for gas and electric; 3) there is 1 MHP that is fully electric master-metered. For the MHPs that have some form of master meter, all but 1 has signed up for the program.

¹¹ Decision (D.) 20-04-004 at 16.

On July 2, 2019, PG&E submitted AL 4116-G/5581-E seeking approval of PG&E's Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201). This form serves to establish an agreement between PG&E and the participating MHP owners and operators under which PG&E would install, own, and operate traditional utility services in MHPs located in Butte County. This agreement details the work that will be performed by PG&E and by the MHP owners' and operators' designated contractor to restore the utility service to the MHP. The Rebuild Program does not cover new developments – it is focused on restoring service and replacing facilities for the 36 MHPs, representing approximately 1,652 spaces, that lost service or had electric and gas facilities damaged or destroyed by the Camp Fire. Although most of the MHPs have submitted formal applications for Rebuild Program, there are 8 mobilehome parks representing approximately 395 spaces that have yet to submit a formal application for the program.¹²

While the Rebuild Program is modeled after the MHP Pilot, it introduces modifications to the Pilot agreement to expedite and tailor the Rebuild Program to the needs of Butte County MHP residents. The differences between the MHP Pilot and the Rebuild Program are described as follows:

- The Rebuild Program is proposed by PG&E for restoration of facilities within MHPs in Butte County that had electric and gas facilities damaged or destroyed by the Camp Fire while the MHP Pilot was designed for all MHPs served by California Investor Owned Utilities (IOUs) and is focused upon improving the safety, reliability, and capacity of existing mobilehomes.
- MHPs in the Rebuild Program, as proposed by PG&E, are not required to be prioritized or pre-qualified, while the MHP Pilot program authorizes the CPUC's Safety and Enforcement Division (SED) to prioritize MHP

¹² Apple Tree Village, Canyon View Estates, Holly Hills Mobile Estates, Hudsons MHP, Paradise TP, Rocky Lane MP, The Plantation, and The Woodlands MHP have not submitted an application.

applications by safety, electric reliability, dual conversion¹³, and capacity improvement.¹⁴

- The Rebuild Program prioritization is based on the order in which the MHP owners and operators submit a complete application for the Rebuild Program. The MHP owners and operators may concurrently obtain clearance from the Butte County and the California Office of Emergency Services (CalOES) Right-of-Entry Permit Program allowing PG&E to enter the MHPs to perform design and construction.
- PG&E proposes to exclude beyond-the-meter work in the Rebuild Program, except when reimbursing the MHP owner and operator's contractor for the purchase and installation of electric meter pedestals. However, PG&E will reimburse the MHP owner and operator for all beyond-the-meter equipment and installation costs in the MHP Pilot.
- PG&E proposes that the Rebuild Program cover the cost to provide utility services to any habitable or useable structure on the MHP property whereas the MHP Pilot does not cover all habitable or usable structures but only certain common use buildings.
- The Rebuild Program allows for the rebuilding of to-the-meter and beyond-the-meter utilities for totally and partially destroyed MHPs while they are being repopulated with residents whereas the MHP Pilot converts mostly populated California Department of Housing and Community Development (HCD) registered spaces to direct utility service(s).
- Insurance on utility infrastructure carried by the MHP owner might reduce the program cost of the Rebuild Program whereas the MHP Pilot does not involve insurance coverage.

¹³ Dual conversion refers to converting both gas and electric distribution systems in a MHP.

¹⁴ As addressed in D.14-03-021 for the MHP Pilot, and incorporated into the MHP program, SED prioritizes the MHPs based on safety first and then on reliability and capacity improvements. Once SED has a list of eligible MHPs prioritized by this risk profile, SED sorts the MHPs into three categories. Category 1 comprises 10% of the eligible MHP spaces in a utility's territory and represents the highest risk systems. Category 2 comprises an additional 10% of the eligible MHP spaces in a utility's territory and represents systems with less inherent risk than Category 1. Category 3 comprises the remaining 80% of eligible MHP spaces in a utility's territory. Each utility schedules work to most efficiently to complete work for MHPs from the Category 1 list provided by SED.

- The per space cost of to-the-meter conversion within the Rebuild Program is projected to be higher than the conversion cost in the MHP Pilot (see cost information below).

D.20-04-004 established a ten-year MHP Conversion Program beginning in 2021 that primarily relied on the MHP Pilot requirements and features. Notable divergence from the MHP Pilot program includes expanded program eligibility and established annual target conversion rates and cost targets. D.20-04-004 also noted that Phase II of R.18-04-018 will explore the narrow issue of standardizing MHP 200-amp electric service system upgrades from a cost, technical, legal, and public policy perspective.¹⁵ Section 2.2 of the Assigned Commissioner's Phase 2 Scoping Memo and Ruling for R.18-04-018 brought up questions related to electrification ready standards of 200-amp service to-the-meter and beyond-the-meter illustrated the desires of the MHP owners for higher capacity electric services in the future.¹⁶

The implication of this Resolution on Phase II of R.18-04-018 will be discussed under the heading "*Alignment with the MHP Decision (D.) 20-04-004 and Phase II of R.18-04-018*" in the Discussion section of this resolution.

NOTICE

Notice of AL 4116-G/5581-E was made by publication in the Commission's Daily Calendar on July 8, 2019. PG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

AL 4116-G/5581-E was protested by Forest Glenn MHP on July 16, 2019; Ridgewood MHP on July 18, 2019; Skyway Villa MHP on July 18, 2019; Pheasant Mobile Estate on July 19, 2019; Pine Springs MHP on July 19, 2019; and Evergreen MHP on July 22, 2019.

¹⁵ D.20-04-004 Conclusion of Law 18.

¹⁶ Assigned Commissioner's Phase 2 Scoping Memo and Ruling for R.18-04-018 at 6

PG&E filed a reply to protests on July 29, 2019. Ridgewood MHP responded to PG&E's reply to protest on August 1, 2019. Jeffrey Mishkin sent out comments in an email in response to PG&E's reply to protest on August 1, 2019.¹⁷

This section describes the issues raised in the protests, PG&E's replies to these protests, and comments to PG&E's reply to protests.

Rebuilt Utility Placement

Evergreen Mobile Home Park, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP indicated in their protests that electric and gas utilities do not have to be placed in the streets.¹⁸ Mr. Daniel Bennett of Evergreen MHP indicated that since there are no mobile homes in the way of installing services, the electric and gas utilities and the pedestal can be placed where the previous electrical service had been routed. PG&E did not reply to this issue.

Damage to Existing Salvageable Utilities During Electric and Gas Utilities Installations

Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, Ridgewood MHP, and Skyway Villa MHP expressed concern that PG&E's proposed service route might damage salvageable utilities, such as the septic system, by crossing over leach fields.¹⁹ Pheasant Ridge, in particular, notes that the location of legacy leach fields will make installation according to PG&E standard locations impossible without catastrophic damage to those fields. Pheasant Ridge notes that this damage would necessitate the rebuilding of these systems according to newer, more restrictive regulations. They assert that this

¹⁷ Jeffrey Mishkin had not indicated affiliation with any organization in the email. The protestors may not reply to the utility's reply according to Section 7.4.3 of General Order (GO) 96-B. Therefore, the contents of Ridgewood MHP's reply and Jeffrey Mishkin's comments are not discussed in this Resolution.

¹⁸ Protests of Evergreen Mobile Home Park, Pine Springs MHP, Pheasant Ridge Mobile Estate, and Ridgewood MHP at 1.

¹⁹ Protests of Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, Ridgewood MHP, Evergreen MHP, and Skyway Villa MHP at 1.

would require installation of a secondary treatment system, and that many of the MHPs eligible for the Rebuild Program probably have the same issues.²⁰

PG&E indicated in its reply that it must ensure that newly installed gas and electric utilities meet current utility design standards and applicable codes, regulations, and requirements based on the most economic, convenient, safe, and efficient service route. PG&E stated that it “will consider the area occupied by the original utility system if it meets all the requirements mentioned above.”²¹ However, with regards to damages to salvageable utilities, PG&E proposes no changes to its current practices with this advice letter.²²

Damage to Underground Facilities During the Debris Removal Process²³

Evergreen MHP indicated that PG&E’s debris removal process might damage underground septic tanks, sewer lines and leach fields.²⁴ Evergreen MHP also stated that its insurance policy does not cover utilities.²⁵

Daniel Bennett, principal owner of the Evergreen MHP stated "We have spent a great deal of money upgrading our systems and if the clean up is not done with some care and consideration it will all be destroyed and like other owners, I have spoken with my insurance policy and it does not cover utilities." He further

²⁰ Protests of Evergreen MHP, Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, Ridgewood MHP, and Skyway Villa MHP at 1.

²¹ PG&E’s reply to protest at 2.

²² Ibid.

²³ PG&E indicated in a data response to Energy Division dated 4/6/20, that “No waste/hazardous material has been removed by PG&E. All waste/hazardous material removal was performed at the owner’s expense and/or via the Butte County/CalOES Right-Of-Entry Permit Program. During pre-construction/construction if there are any soils found that do not meet environmental standards, those soils will be removed as part of this program. PG&E has yet to find any issues associated with environmentally sensitive soils.”

²⁴ Protest of Evergreen MHP at 1.

²⁵ Ibid.

stated that "These are my main concerns other than when will the clean up actually happen and how will I afford the work not covered by insurance."²⁶

PG&E indicated in its reply that electric infrastructure is the focus of Rebuild Program and septic system rebuilding is not included in the program.²⁷

Legacy Utility Owned Infrastructure Removal

Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP suggest that legacy infrastructure such as aboveground and below ground transformers should be removed by PG&E at no cost to the MHP owner.²⁸

PG&E indicated in its reply that PG&E will remove the existing utility-owned assets that are not in use upon completion of the rebuild effort. PG&E indicated that they will not be removing assets that are not PG&E owned, as PG&E does not have ownership over non-PG&E owned assets.²⁹

Location of the Electric and Gas Meters

All the protestants expressed concern that placing the gas and electric meters in the portion of the mobilehome space adjacent to the street, as PG&E requires, makes it difficult to install new mobilehomes into the space and is unsightly. The protestants indicated that as an alternative, meters can be placed along the side of the mobilehomes toward the rear of the carport.

PG&E replied that all assets that PG&E installs need to meet current utility design standards and applicable codes.³⁰ The meter locations should be determined by the standards outlined in PG&E's Electric & Gas service

²⁶ Protest of Evergreen MHP at 1.

²⁷ PG&E's reply to protest at 2.

²⁸ Protests of Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, Ridgewood MHP at 2.

²⁹ PG&E's reply to protest at 3.

³⁰ PG&E's reply to protest at 3.

Requirements (Greenbook).³¹ These standards require placing the meters near the front of the mobilehomes.

Electric Service Amperage Rating

All protestants expressed concern that 100 amp electric service as proposed by PG&E would be inadequate. Pine Springs MHP, Pheasant Ridge Mobile Estate, and Ridgewood MHP commented that electric service should be at least 150 amps.³² Evergreen MHP, Forest Glenn MHP, and Skyway Villa MHP then recommended 200 amps of electric service.³³

Forest Glen MHP indicated that “We would need to have 200 Amp service, which is required for FEMA³⁴ trailers that we may acquire.”³⁵

Skyway Villa MHP indicated that “Contemporary manufactured homes are designed to run on 200 amps. Limiting park infrastructure to 100 amps would be like building a parking garage where every parking stall is half the size of a normal car. It just doesn't work.”³⁶

Ridgewood MHP indicated that “100 Amp service is marginal at best with modern doublewide MHs, commonly as large as 27' X 56' (1,512 sq. ft.). I had eliminated many older singlewide MHs and residents brought in 16 new double wide MHs in my 100 space MHP. They were delivered with every appliance possible on gas so there was enough electrical service remaining for the HVAC system. Then residents switched out some of the gas appliances for electric and

³¹ Section 2.3.6 of the Greenbook specifies mobilehome park gas service requirements and section 6.4.1 specifies electric service requirements.

³² Protests of Pine Springs MHP, Pheasant Ridge Mobile Estate, and Ridgewood MHP at 1.

³³ Protests of Evergreen Mobile Home Park, Forest Glenn MHP, and Skyway Villa MHP at 1.

³⁴ Federal Emergency Management Agency (FEMA)

³⁵ Protest of Forest Glen MHP at 1.

³⁶ Protest of Skyway Villa MHP at 1.

the problems with the overloaded electric system started. The electric service should be at least 150 Amps for the MHs that buyers want today.³⁷

PG&E stated in its reply to protests that the Rebuild Program intends to install infrastructure that provides the same level of utility service as existed at the MHP prior to the Camp Fire or to install infrastructure that meets current utility standards and applicable code. PG&E clarified that the Rebuild Program does not intend to provide a service upgrade. PG&E also indicated that “the infrastructure that PG&E will be installing as part of the Butte County Mobilehome Park Rebuild Program will be able to accommodate services up to 200 amps, but if the MHP was previously served at 100 amps service, the MHP owner/operator would need to submit an application for a service upgrade under Rule 3 with a request to increase the panel size meeting requirements under Rule 2 and Rule 16.”³⁸ The standard service level PG&E proposes to provide under the Rebuild Program is 100 amps, according to Section 5.3.2 of the Butte County Mobilehome Park Rebuild Program Agreement.

PG&E clarified in a data response to Energy Division dated October 3, 2019, that “the intent of BCMHPRP is to rebuild the mobilehome parks to current standards. PG&E is planning on installing conduit that can accommodate up to 200 amps, but the transformers would be designed to provide electricity based on the current standard of 100 amps per mobilehome.”³⁹ If a mobilehome owner wishes to provide 200 amp service for each of their spaces, the MHP owner can request a service modification through the BCMHPRP or a Rule 15 application. The added cost for this service modification would be at the MHP owner’s expense.”

A more detailed discussion of the infrastructure upgrades and costs involved is included in the *Electric Service Amperage Rating* portion of the “Discussion” section of this Resolution below.

³⁷ Protest of Ridgewood MHP at 1.

³⁸ PG&E’s reply to protest at 2.

³⁹ PG&E proposes to use 3-inch Polyvinyl Chloride (PVC) conduits instead of its standard 2-inch PVC conduits for MHP 100 amp service. This is to enable a future upgrade to 200 amp service. BCMHPRP refers to the Butte County Mobilehome Park Rebuild Program.

MHP Owner/Operator Beyond-The-Meter Work Completion Deadline

Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP, raised concerns about the following language in Sections 9.1.1 and 9.1.1.3 of the MHP Rebuild Program Agreement: “PG&E may cancel or suspend this Agreement for, but not limited to, the following situations: The failure or inability of the MHP Owner/Operator to complete the work and be ready to receive service from PG&E within twelve (12) months of the execution of this Agreement; or”. They argue that Section 9.1.1.3. should be deleted because it will take many years to repopulate the MHP.⁴⁰

PG&E agrees with the MHP owners that beyond-the-meter services may not be ready within 12 months of the execution of the Butte County Mobilehome Park Rebuild Program Agreement. PG&E indicated that it would submit a supplemental Advice Letter to 4116-G/5581-E to remove section 9.1.1.3 which currently provides: “The failure or inability of the MHP Owner/Operator to complete the work and be ready to receive service from PG&E within twelve (12) months of the execution of this Agreement;”⁴¹

Sections of the MHP Rebuild Program Agreement on Duration of the Rebuild Program

These protestants also suggest that PG&E should revise section 10.6 of the agreement.⁴² Although this section of the agreement specifies the conditions under which MHP Owner and Operator may be reimbursed for beyond-the-meter work, the protestants ask that PG&E to formally acknowledge that the

⁴⁰ Protests of Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP at 2.

⁴¹ PG&E’s reply to protest at 3.

⁴² Section 10.6 of the agreement reads: “As soon as practicable and after any jurisdictional authorities have inspected and approved operation of the “Beyond-the-Meter” work, the MHP Owner/Operator may submit invoices to PG&E for “Beyond-the-Meter” work. Invoices submitted shall be submitted in no less than twenty-five percent (25%) increments based on the number of converted MH-Space compared to the total number of eligible MH-Spaces at the MHP. The final reimbursement for the “Beyond-the-Meter” work will be paid to the MHP Owner/Operator after the final commission has been completed and the entire MHP is ready to receive direct PG&E service.”

Rebuild Program will be an active program for a decade or more while the MHPs in Butte County are repopulated.⁴³

PG&E proposed in AL 4116-G/5581-E that the only beyond-the-meter equipment to be covered by the Rebuild Program would be the electric pedestal and/or gas meter. They also indicated in their reply that “connection from the electric pedestals and/or gas meters to the mobile homes are not covered under this program as most mobile home spaces do not currently have mobile homes available to receive service.”⁴⁴ Hence, given the nearly complete absence of beyond-the-meter work in the Rebuild Program, PG&E asserts that “the Butte County MHP Rebuild Program would not need to wait for the mobilehome parks to be repopulated. PG&E believes that given this scope, the Butte County Mobilehome Park Rebuild Program will be completed in 3 years and no further extension is warranted.”⁴⁵

Section of the Mobilehome Park Rebuild Program Agreement on Indemnification Clause

Several protestants also request that Section 12 of the Butte County Mobilehome Park Rebuild Program Agreement be revised to have a more balanced indemnification clause.⁴⁶ The park owners and operators interpret this clause as requiring them “to indemnify, defend and hold harmless PG&E et al., if the park owner performance of the Agreement in any respect contributes to the injury/death of an involved person, property damage, or law/regulation violation **“regardless of any strict liability or negligence of PG&E”** ...”.⁴⁷ These protestants indicated that this clause appears to be an extremely one-sided indemnification intended solely for the benefit of PG&E.

⁴³ Protests of Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP at 2.

⁴⁴ PG&E’s reply to protest at 4.

⁴⁵ PG&E AL 4116-G/5581-E at 2 and PG&E’s reply to protest at 4.

⁴⁶ Protests of Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP at 2.

⁴⁷ Protest of Pheasant Ridge Mobile Estate, at 2 (Emphasis added by protestant).

PG&E indicated that it “incorporated many of the provisions from the Mobilehome Park Utility Upgrade Program Agreement (Form 79-1165) into the Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201), including the indemnification clause. The indemnification clause in the Butte County MHP Program agreement is essentially identical⁴⁸ to the clause already approved by the Commission for reconstruction projects and should not be changed.”⁴⁹

DISCUSSION

PG&E submitted this Advice Letter to request approval of the Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201). The CPUC has evaluated the applicability of the MHP Pilot agreement to the Rebuild Program, alignment with MHP Decision (D.) 20-04-004 and Phase II of R.18-04-018, reporting requirements on Rebuild Program expenses, extending to-the-meter eligibility to common use buildings but not recreational vehicle (RV) spaces, coordination with primary jurisdiction (e.g. city or county) and non-energy service providers, the effect of prioritization of the MHPs in the Rebuild Program on the MHP Conversion Program, insurance coverage of MHP owned utility systems, modification of the Butte County Mobilehome Park Rebuild Program Agreement due to protested issues raised in this Advice Letter, and policy precedent for similar disasters. All applicable changes ordered in this resolution should be reflected in a revised Butte County Mobilehome Park Rebuild Program Agreement submitted via advice letter.

Applicability of the MHP Pilot agreement to Rebuild Program

The proposed agreement is a contract between PG&E and the MHPs whose utility infrastructure was damaged or destroyed by the Camp Fire and were provided electric and/or gas service by PG&E prior to the fire. The to-the-meter scopes of work of the MHP Pilot and the Rebuild Program are sufficiently similar to allow the MHP Pilot agreement to provide an applicable basis for one used in the Rebuild Program. Program differences between the MHP Pilot and the Rebuild Program are outlined in the Background section above. Therefore, the

⁴⁸ PG&E notes that the only difference in the entire indemnification clause is the substitution of “program” for “conversion.”

⁴⁹ PG&E’s reply to protest at 4.

Butte County Mobilehome Park Rebuild Program Agreement may be modeled after the Pilot program's Mobilehome Park Utility Upgrade Program Agreement (Form 79-1165) but should be tailored to the specific needs of the Rebuild Program and aligned with CPUC action taken since the publication of this form. Modifications to the Butte County Mobilehome Park Rebuild Program Agreement will be discussed below.

Alignment with the MHP Decision (D.) 20-04-004 and Phase II of R.18-04-018

Decision (D.) 20-04-004 concludes that MHP Pilot was successful in achieving its intended safety improvements and established a ten-year MHP Conversion Program. In addition to this conclusion, it establishes program rules and reporting requirements in which the Rebuild Program should align with the Decision.

Mobilehome Park Rebuild Program Agreement alignment

PG&E's Butte County Mobilehome Park Rebuild Program Agreement (Gas and Electric Sample Form 79-1201) is based on its Mobilehome Park Utility Upgrade Program Agreement (Form 79-1165). D.20-04-004 requires the following revisions to Form 79-1165:

- PG&E is responsible for proper gas purging of the legacy systems.
- The MHP owners and operators are responsible for obtaining a permit for abandonment of the legacy system.
- MHP owners and operators are responsible for costs associated with the existing legacy systems (MHP systems beyond the PG&E master meter), including removal.⁵⁰
- MHP owners and operators are responsible for the removal of legacy above ground gas facilities, i.e., submeters and risers.

⁵⁰ D.20-04-004, Appendix C, Section 5.6.2 of the Proposed Revised Mobilehome Park Utility Upgrade Program Agreement reads as follows: [Utility] shall not remove the existing legacy system unless necessary, and the system shall be abandoned in place. [Utility] shall isolate the new and existing legacy systems. [Utility] shall not incur any expenses associated with the removal or retirement of the existing system under the MHP Program. Should removal of the sub-metered distribution system be necessary to complete the conversion to direct utility service from [Utility], such costs may, at [Utility]'s discretion, be included in the MHP Program if it is necessary and can be done so efficiently.

- MHP owners and operators are responsible for costs associated with environmental, cultural, and endangered species remediation or other resolutions.⁵¹
- MHP owners and operators are responsible to disclose during the design phase of the project any potential issues (e.g., cultural, environmental, endangered species) or risk removal from the program.
- MHP owners and operators are responsible for reasonable beyond the master-meter costs incurred by PG&E prior to notification that an MHP owner and operator is canceling an MHP agreement.

In order to honor the conclusions reached by the CPUC in D.20-04-004, we find that the above program revisions should also apply to the Butte County Mobilehome Park Rebuild Program Agreement⁵² However, any revisions to the Butte County Mobilehome Park Rebuild Program Agreement adopted in this resolution are not precedential for the MHP Conversion Program and will only apply to the Rebuild Program.

Currently, most converted MHPs use an electrical service standard of 100 amps, but some parties in R.18-04-018 recommend adoption of a different, particularly higher, standard to enable the safe and reliable operation of all-electric MHs, and the future electrification of end uses to achieve state goals. In response to Conclusion of Law 18 of D.20-040-004, phase II of R.18-04-018 investigates the development of an electrification ready service standard for the electrification of existing and new all-electric mobilehomes for to-the-meter and beyond the meter services. Phase II of the R.18-04-018 proceeding also investigates the cost categories, inputs, and assumptions to use in estimating the cost implications of different electrification ready service standards for the MHP Conversion Program.⁵³

The objective of this Resolution is to implement requirements based on the current needs and benefits of the residents in the Rebuild Program. Any

⁵¹ PG&E are responsible for removal of hazardous debris from the Camp Fire, but not required to address preexisting environmental, cultural resource, or endangered species issues. Resolution refers to human-wildlife conflicts involving species of conservation interest.

⁵² D.20-04-004 at 132.

⁵³ Assigned Commissioner's Phase 2 Scoping Memo and Ruling for R.18-04-018 at 6

economic measures taken would not interfere but would complement the issues currently being investigated under Phase II of the proceeding.

Reporting Requirements on the Rebuild Program Expenses

To-The-Meter work within the Rebuild Program is very similar to to-the-meter work within the MHP Conversion Program. PG&E has indicated that it has not determined whether it will seek to recover any additional costs associated with the MHP Rebuild Program.⁵⁴ Due to the significant differences between per space program costs and the lack of clarity on cost recovery, it is necessary to track these costs in the same manner as those incurred in approved programs.

In 2019, PG&E incurred a total cost of \$2,751,424.80 in the Rebuild Program.⁵⁵ Construction was in progress, but no spaces were completed in 2019. PG&E completed 110 spaces in 2020 with a total expenditure of \$13,301,768.89.⁵⁶ PG&E plans to complete 478 spaces in 2021 at a projected cost of \$18,013,233, 244 spaces in 2022, and 103 spaces in 2023. PG&E anticipates spending approximately \$34 million for 2022 and beyond.⁵⁷ The total Rebuild Program expenditure is projected to be \$68,066,426.69.⁵⁸ PG&E indicated that all the projected costs are estimates and represent 1,293 spaces that have submitted an application for the Rebuild Program. These figures do not include the 8 MHPs (395 spaces) that have yet to submit a formal application for the Rebuild Program. The projected costs beyond 2021 are subject to change. However, based on the current projections, the average to-the-meter cost would be approximately \$52,642.25 per space.

⁵⁴ PG&E Advice Letter 4116-G/5581-E at 3.

⁵⁵ PG&E updated the cost figure in a data response dated 2/9/21

⁵⁶ PG&E indicated in a data response dated 2/19/2021, that this total expenditure in 2020 included other projects that are anticipated to be active in 2021 and beyond.

⁵⁷ Data response to Energy Division on 2/11/21.

⁵⁸ Total Expenditure is a revised estimate based on a data response from PG&E dated February 11, 2021. PG&E's estimate in a data response dated March 30, 2020, was \$63,081,475, and an initial estimate in a data response dated October 3, 2019, was \$71,804,180.

The confidential version of PG&E's Mobile Home Park Utility Upgrade Program 2020 CPUC Report contains confidential cost information which would enable the calculations of the average unit cost of total to-the-meter and beyond-the-meter conversion (including to-the-meter and beyond-the-meter electric and gas conversion costs). Furthermore, PG&E's 2020 MHP Pilot annual report also shows that the total to-the-meter cost is approximately 80% of the total to-the-meter and beyond-the-meter cost consistently for 2016 thru 2020. Comparing this to PG&E's projection for the Rebuild Program per space costs, which only cover to-the-meter expenses and the electric meter pedestal costs, the Rebuild Program per space cost projection is over 50% higher than PG&E's to-the-meter per space cost in the MHP Pilot.⁵⁹

PG&E indicates that the costs of to-the-meter conversion of the Rebuild Program are likely to be higher than the costs incurred for similar activities within the MHP Pilot due to 1) the known presence of shallow solid rock in Butte County, 2) the hauling and disposal of contaminated soil, and 3) the need for temporary propane service to mobilehomes that survived the Camp Fire. Some of these additional costs might be offset by the participation of 3rd party joint trench participants. However, PG&E states that the rate of 3rd party participation is currently unknown.⁶⁰ Hence, this possible source of cost savings cannot be included in the cost estimate.

The only beyond-the-meter component of this program, the cost of the electric meter pedestals, is minimal in comparison to the overall cost. Hence, it is not a significant cost factor that would affect the overall per space cost. Further discussion of these costs is given in the *Electric Service Amperage Rating* portion of the "Discussion" section below. Due to the significant difference in the to-the-meter per space cost between the MHP Pilot and the Rebuild Program, PG&E should track the rebuild cost of the Rebuild Program closely in an annual reporting template to allow for benchmarking against the MHP Conversion Program.

⁵⁹ Staff compared the confidential electric and gas per space cost of the MHP Pilot with the per space cost of the Rebuild program to determine an exact percentage. However, the 50% is a rough estimate due to data confidentiality.

⁶⁰ Data response to Energy Division on 9/26/2019 at 6.

Data from the Rebuild Program conversion work would also be beneficial for the long-term planning of the MHP Conversion Program. To-The-Meter expenses should be reported annually using a modified template, as is required in PG&E's Mobile Home Park Utility Upgrade Program Annual CPUC Report. D.20-04-004 modified the reporting requirements and these revisions should also be reflected in the Rebuild Program reports. These revisions require additional data on an annual basis including:

- Demographic data such as the levels of participation in the California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs, Disadvantaged Communities (DAC) status, Rural/Urban designation, numbers of Medical Baseline customers, etc.
- D. 20-04-004 also requires aggregation of confidential data to protect customer privacy and competitor contractor information⁶¹

Extending To-The-Meter eligibility to Common Use Buildings and Permanent Fixed Foundation Residential Structures but not Recreational Vehicle (RV) Spaces⁶²

PG&E has proposed to cover the cost of extending to-the-meter service to any habitable/usable structure on MHP property of the Rebuild Program. D.20-04-004 also considered extending to-the-meter eligibility to common use buildings

⁶¹ D.20-04-004 at 137

⁶² The Department of Housing and Urban Development defines a recreational vehicle as one built on a vehicular structure, not certified as a manufactured home, designed only for recreational use and not as a primary residence or for permanent occupancy, and built and certified in accordance with either the National Fire Protection Association (NFPA) or American National Standards Institute (ANSI) consensus standards for recreational vehicles. Please refer to website at:

<https://www.hud.gov/sites/documents/FRNOTICE2916.PDF>.

FEMA also provides a detailed definition of Recreational Vehicle at:
<https://www.fema.gov/glossary/recreational-vehicle>

RVs usually mean either a motor vehicle or trailer intended for use as a temporary dwelling. They normally do not have hook ups for permanent electric and gas utilities, using electrical sockets and propane tanks instead. Mobilehomes, especially the newer and larger homes, are designed for semi-permanent residence and infrequent moves, with permanent utility connections.

but rejected the proposal to extend service to RV spaces.⁶³ In order to remain consistent with D.20-04-004, PG&E should extend to-the-meter eligibility to common use buildings, but not recreational vehicle (RV) spaces. However, PG&E may extend to-the-meter electric and gas services to permanent fixed foundation residential structures in order to fulfill its commitment to rebuild these utilities destroyed by the Camp Fire. PG&E also is not prohibited from performing rebuild work beyond the scope specified in D.20-04-004. Costs incurred for work whose scope exceeds D.20-04-004 will not be recoverable through rates.

Coordination with Primary Jurisdiction (e.g., city or county) and Non-Energy Service Providers

As required by D.20-04-004, PG&E should continue to notify and coordinate with primary jurisdiction (*e.g.*, city or county) and non-energy utilities who serve MHPs scheduled for utility rebuild and who could participate in installing or upgrading their facilities in conjunction with the Rebuild Program work. Coordination⁶⁴ should be done in a manner which benefits CPUC regulated gas and/or electric utility customers.⁶⁵ In addition, during the planning phase or upon submission of the application, utilities conducting mobilehome work pursuant to this Resolution shall be required to notify the California Advanced

⁶³ SoCalGas/SDG&E commented in R.18-04-018 that recreational vehicle (RV) spaces that are interspersed amongst MHP spaces should be eligible for the MHP program. In some instances, lack of clarity exists at parks regarding whether a specific space is a MHP or RV space. D.20-04-004 delayed consideration of RV space eligibility in a Mobilehome Park utility conversion program until SED collects and confirms appropriate MHP physical configuration data through the MHP application process and/or 2025 second evaluation.

⁶⁴ For instance, to the extent that the respective MPH's wireline communications service provider would benefit by placing their facilities within a joint trench as placed by PG&E to ensure safety, the Commission highly recommends cooperation. PG&E shall coordinate with interested Internet Service Providers (ISPs) on trench access and broadband conduit installation.

⁶⁵ D.20-04-004 at 6.

Services Fund (CASF) regional broadband Consortia⁶⁶. The notification should include the project location (street address and Geographic Information System coordinates (if possible), timeline, PG&E contact, and other relevant information. PG&E should provide the non-energy service providers with a prioritized list of participating MHPs as early as possible in the program cycles to encourage participation.

The Effect of Prioritization of the MHPs in the Rebuild Program on the MHP Conversion Program

PG&E proposed that MHPs need not be prioritized or pre-qualified under the prioritization criteria of the MHP Pilot to qualify for the Rebuild Program. Even MHPs whose upgrades were deemed low priority under the MHP Pilot and spaces that were previously directly served by PG&E will qualify. This blanket approval policy raised concerns that the resources devoted to the Rebuild Program would lead to delays in existing MHP Utility Conversion programs. Energy Division staff asked PG&E whether redirecting PG&E resources to give priority to Butte County MHPs would have an impact on the existing Category 1 MHPs applying to the MHP Conversion Program.

In response, PG&E indicates that there is currently adequate management and overhead staff, and civil resources are being added or reallocated as necessary to simultaneously support both the Rebuild Program and the MHP Conversion program at their full capacities.⁶⁷

Insurance Coverage of MHP owned Utility Systems

In its protest, Evergreen MHP indicated that insurance policies for MHPs typically do not cover utilities. California does not require MHP owners and operators to carry property or liability insurance coverage, unless such coverage is required by a mortgage lender. Therefore, MHP owners and operators might not carry any insurance coverage for underground utility lines, utility pedestals, and electrical distribution equipment. PG&E does not have information on what

⁶⁶ The website: <https://www.Commission.ca.gov/General.aspx?id=6442461039> contains contacts by geographic areas for CASF.

⁶⁷ Data response to Energy Division on 7/23/2020 at 1.

insurance payments may have been made to park owners or how those funds may have been spent.⁶⁸

Despite the lack of insurance coverage indicated by the protesting MHP owners and operators⁶⁹, there had been 64 wildfires in Butte County between 2007 and the start of the Camp Fire⁷⁰ and some MHP owners and operators might have opted to carry insurance as a result.

However, Ridgewood MHP has raised valid concerns related to the insurance claim remittance issue in their comments to the Resolution. Therefore, the Commission will waive the insurance remittance requirement.⁷¹

Modification of the Butte County Mobilehome Park Rebuild Program Agreement due to Protested Issues Raised in this Advice Letter

There were ten protested issues by MHP owners and operators. Discussion of closely related issues are combined in the following subsections, each corresponding to the protests section above. These issues are related to underground utility placement⁷², preservation of existing underground sewage systems⁷³, removal of legacy infrastructure, location of utility meters, electric

⁶⁸ PG&E data response to Energy Division on 9/26/2019 at 1.

⁶⁹ Protest of Evergreen MHP at 1.

⁷⁰ Source: CalFire website at:

<https://www.fire.ca.gov/incidents/IncidentSearch?q=butte+county>

⁷¹ Please refer to the Comment section for the specific concerns raised by Ridgewood MHP.

⁷² Placing utilities lines within the street and proper locations for pedestals and their associated meters

⁷³ Damage to existing underground sewage system during electric and gas utility systems' installation and cleanup of existing infrastructure.

capacity⁷⁴, and language within the Butte County Mobilehome Park Rebuild Program Agreement⁷⁵.

Rebuilt Utility Placement

MHP owners and operators indicate in their protests that electric and gas utilities do not have to be placed in the streets. They expressed a preference for the route that the previous service had taken and concerns that PG&E might damage salvageable utilities due to (1) the route taken in service installation and (2) the debris removal process. In consideration of these salvageable legacy systems, PG&E is directed to consider alternate service routes that meet applicable codes, regulations, and requirements.

Damage to Existing Salvageable Utilities and Underground Facilities

Since subsurface salvageable utilities may be closer to the surface than expected, PG&E shall implement the following minimum measures to locate underground assets that are within the vicinity of a worksite prior to breaking ground.

- PG&E shall work with the MHP owners and operators to identify salvageable underground utilities such as electrical, communications, gas, water, sewage, septic system, and leach fields.
- PG&E shall develop an excavation plan and consult with MHP owners and operator on the plan prior to starting excavation.
- PG&E shall, when possible, electronically and physically confirm the actual locations and depths of the underground asset.
- PG&E shall protect and support exposed underground Infrastructure and erect safety barriers at the work site.
- PG&E shall Immediately notify the MHP owners and operators of any damage to underground Infrastructure asset.

While damage to existing utilities or facilities is not expressly addressed in the agreement, damages generally are addressed. According to Section 12 of the Butte County Mobilehome Park Rebuild Program Agreement, PG&E is responsible for the “claims, demands, losses, damages, costs, expenses, liability

⁷⁴ Recommending 150-amp and 200-amp services

⁷⁵ Complete BTM work and ready to receive service in 12 months, BTM work reimbursement, and Indemnification clause

or violation of law or regulation as may be caused by the active gross negligence or willful misconduct of PG&E, its officers, agents, or employees.” Hence, PG&E is aware of its potential liability and Section 6.1.1 of the Butte County Mobilehome Park Rebuild Program Agreement should remain unchanged.⁷⁶

Legacy Utility Owned Infrastructure Removal

MHP owners and operators suggest that PG&E should remove legacy infrastructure in the Rebuild Program. In order to contain the Rebuild Program costs to reasonable levels, the CPUC agrees that PG&E should continue its standard safety practice of abandoning its underground assets in place. MHP owners and operators, however, are responsible for MHP-owned legacy infrastructure. PG&E may remove existing legacy system owned by the MHPs only with the MHP owner’s permission. Hence, Section 6.5.4 of the Butte County Mobilehome Park Rebuild Program Agreement should be revised to read: “PG&E shall not remove the existing legacy system owned by the MHPs and the system shall be abandoned in place unless removal is necessary and MHP owner’s permission has been obtained. PG&E shall ensure that the new and the existing legacy systems are electrically and physically isolated from each other. PG&E shall not incur any expenses associated with the removal or retirement of the existing system owned by the MHP owners under the MHP Rebuild program. Should removal of the legacy distribution system owned by the MHP owners be necessary to complete the MHP Rebuild program, such costs may at PG&E’s discretion be included in the MHP Rebuild Program if it is necessary and can be done so efficiently.”

Location of the Electric and Gas Meters

All the protestants expressed concern on the location of the electric and gas meters. As mentioned above in the “Protest” section, PG&E is planning on installing these meters in accordance with PG&E’s Electric & Gas Service Requirements (Greenbook).⁷⁷ Hence, Section 6.1.3 of the Butte County

⁷⁶ Section 6.1.1 reads “PG&E will design and install the new “To-the-Meter” electric and/or gas distribution and service system for the MHP to meet current Utility design standards and applicable codes, regulations and requirements based on the most economic, convenient and efficient service route.”

⁷⁷ The Electric and Gas Service Requirements (Greenbook) is a guide to PG&E requirements and policies for establishing electric and gas service to new or remodeled

Mobilehome Park Rebuild Program Agreement should remain unchanged.⁷⁸ PG&E should take into consideration the area occupied by any salvageable utility systems to avoid damaging existing salvageable utilities either when installing new gas and electric utilities or during the debris removal process.

Electric Service Amperage Rating

In the MHP Pilot, PG&E increased the electric capacity of electric services in MHPs from a historic range of 30 to 50 amps to a minimum of 100 amps so that the MHP residents can utilize modern appliances. PG&E is intending to provide a minimum of 100 amp service to the MHPs in the Rebuild Program. MHP owners and operators, however, filed protests advocating for 150 amp and 200 amp services in the Rebuild Program. They indicated that FEMA trailers and contemporary manufactured homes are designed to run on 200 amps and that they have experienced issues with overloaded electrical systems when residents replaced gas appliances with electric ones. PG&E indicated that “At this time, Edgewood-Sawmill Estates is the only MHP identified to receive 200 amp service before the Camp Fire.”⁷⁹

FEMA trailers are intended to provide 18 months of temporary housing for homeowners after a disaster. Historically, they are poorly insulated, and typically have two propane tanks on the front of the trailer which provide the hot water, indoor heating, and gas for the stove and oven.⁸⁰ There are also newer

applicant installations. PG&E regularly updates and publishes new versions of the Greenbook. The 2020-2021 Greenbook is the latest version.

Electric and gas meter requirements contained in Green Book Section 2 – Gas Service, PG&E’s Gas Design Standard J-15.1, and Utility Standard 05251 – Electric Service Requirements for Mobile Home Developments

⁷⁸ Section 6.1.3 reads “PG&E will consult with the MHP Owner/Operator to identify the location of each electric/and/or gas meter and any protection required for the metering service equipment. PG&E will have the final approval of the location of the meter.”

⁷⁹ Data response to Energy Division dated August 24, 2020.

⁸⁰ Wikipedia: https://en.wikipedia.org/wiki/FEMA_trailer

FEMA trailers with 200 amp service for sale.⁸¹ Staff has contacted the seller but has received no response.⁸² Kathy Catanho, owner of the Forest Glen MHP also indicated in a phone conversation and via email that “At one point, it seemed as though FEMA might be interested in providing Mobiles on an interim basis to assist in the housing for burned out individuals. Since the units were all electric (no gas appliances) I felt it would be challenging to provide all of that with only a 100 amp service. However, FEMA determined that they would not be working with any Paradise MH Parks to provide interim housing. So I let this go.”⁸³ Given FEMA’s determination that they will not be providing trailers, the 200 amp requirement for the sole purpose of powering FEMA trailers is questionable.

While FEMA trailers may not be utilized, protestants assert a need for 200 amp service to serve modern or all-electric manufactured homes that are likely to repopulate these MHPs.

Each manufactured home must be designed to the federal Manufactured Home Construction and Safety Standards of 24 CFR⁸⁴ 3280, commonly called the HUD Code. HUD current standard has 3 thermal load zones in the nation⁸⁵ while Title 24 of California consists of 16 Climate Zones within California alone.⁸⁶ HUD Code considers a manufactured home as one home thermal envelope and

⁸¹ <http://femahomesforsale.com>.

⁸² Phone call to the seller(<http://femahomesforsale.com>) by staff on 11/12/20.

⁸³ Phone conversation with Kathy Catanho and email on 11/13/20

⁸⁴ Code of Federal Regulations

⁸⁵ A thermal zone is a space or collection of spaces having similar space-conditioning requirements, the same heating and cooling setpoint, and is the basic thermal unit (or zone) used in modeling the building. A thermal zone will include one or more spaces.

⁸⁶ Slide 113 of the presentation package at the *Building Decarbonization and Mobilehome Park Electrification and Tenant Protection Topics* workshop. The full set of slides is available at:

https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Safety/Mobile_Home_Parks/BD%20Phase%20II%20and%20MHP%20Workshop_09152020_FINAL.pdf

requires a combined U-Value⁸⁷ of 0.096 in California, while Title 24 requires every part of the building envelope to have its own U-Value code requirement. Therefore, HUD energy efficiency code requirements are more relaxed than Title 24 of California.

Furthermore, an Advanced Energy Rebuild (AER) program was created by the Sonoma Clean Power, Pacific Gas and Electric Company (PG&E), and the Bay Area Air Quality Management District to help homeowners affected by the October 2017 firestorms to rebuild energy efficient and sustainable homes. Manufactured homes qualify for base incentives. Manufactured homes that meet Energy Star Version 2.0 requirements receive base financial incentives.⁸⁸ All-electric manufactured homes with heat pump for space and water heating and induction cooking receive bonus incentives.⁸⁹ Hence, the AER program provides financial incentives to rebuild manufactured homes to exceed HUD code requirements and the demand for 200 amp electric services.

Nic Dunfee of TRC Companies Inc., indicated in a presentation at a September 15, 2020 workshop on *Building Decarbonization and Mobilehome Park Electrification and Tenant Protection Topics* that approximately 4,000 manufactured housing units were delivered across California in 2019 and approximately 50% of them were all

⁸⁷ U-Value is the overall coefficient of heat transmission of the manufactured home based on the respective thermal zone location, at an indoor design temperature of 70°F, and is measured in Btu/hr·ft²·°F.

⁸⁸ \$3,000 for single family home, duplex, or townhome. \$1,500 for accessory dwelling unit (ADU). Slide 123 of the presentation package at the *Building Decarbonization and Mobilehome Park Electrification and Tenant Protection Topics* workshop.

⁸⁹ It is up to \$1,000 of bonus incentive for single family home, duplex, or townhome; and up to \$500 of bonus incentive for ADU. Slide 123 of the presentation package at the *Building Decarbonization and Mobilehome Park Electrification and Tenant Protection Topics* workshop.

electric.⁹⁰ Manufactured homes are concentrated in rural area that often lack access to piped natural gas.⁹¹

Therefore, the CPUC should anticipate that demand for 200 amp services will continue to increase as more all-electric HUD compliant mobilehomes come into the State. Furthermore, even if a mobilehome homeowner chooses to live in a dual fuel home that does not require a 200-amp panel today, which is approximately 50% of the marketplace, the increased panel size will enable the MH owner to install electric vehicle (EV) charging. Given these market realities and desire to enable the adoption of electric vehicles, we find it appropriate to explore the costs of 200 amp service.

Jeffrey Jenkins of SCE also indicated in a presentation titled "*Southern California Edison (SCE) Electrification of MHPs*" at this workshop that an all-electric MHP unit would require remodeling or retrofitting of its existing meter panel to a minimum of 200 amps. He further indicated that "100 amp panels may not have capacity to support an all-electric unit."⁹²

Reaching decarbonization goals of 75 percent or greater reduction in greenhouse gas emissions will require eliminating most of the carbon dioxide produced by furnaces and water heaters across the country, alongside other measures across the economy.⁹³ For most new home construction, electrification of space and water heating and air conditioning reduces the homeowner's costs over the lifetime of the appliances when compared with performing the same functions

⁹⁰ A video of the stakeholder workshop for Building Decarbonization Phase II Staff Proposal and Mobilehome Park Electrification and Tenant Protection Topics is available at: <https://www.youtube.com/watch?v=i-H0lF9hoDs&feature=youtu.be>

⁹¹ American Council for an Energy-Efficient Economy. Jacob Talbot. "Mobilizing Energy Efficiency in the Manufactured Housing Sector". July 2012.

⁹² Slide 109 of the presentation package at the *Building Decarbonization and Mobilehome Park Electrification and Tenant Protection Topics* workshop.

⁹³ RMI. [Sherri Billimoria](#), [Leia Guccione](#), [Mike Hennen](#), and [Leah Louis-Prescott](#). "The Economics of Electrifying Buildings". 2018. <https://rmi.org/insight/the-economics-of-electrifying-buildings/>

with fossil fuels.⁹⁴ Technologies also are available to efficiently and affordably electrify homes, especially as heat pumps for heating and cooling space and water have improved. Air source heat pumps can reduce electricity use 50% compared to electric resistance appliances. Heat pump water heaters are 3 to 5 times more energy efficient than gas storage water heaters.⁹⁵ Therefore, the Commission also should anticipate demand for 200 amp service due to the increased load imposed by electric space conditioning, water heating, and cooking equipment found in modern mobilehomes. Hence it is reasonable to anticipate that, 200 amp electric service upgrades are likely to be required for modern all-electric mobilehomes, particularly if the owners have an electric vehicle.

PG&E indicated “There is no standard service level for a new MHP space in PG&E’s service territory. The acceptable amperage ranges from 50-amp service to a max of 200-amp service.”⁹⁶ Therefore, the analysis below will focus on the more common PG&E service levels of 100 and 200 amps.⁹⁷

PG&E indicated that it will be able to reuse the following survived infrastructure: 1) transformers at Sherwood Forest MHP and Pine Grove MHP, 2) 2-inch” gas mains at Quail Trails Village and Idlewild MHP, and 3) some of the secondary⁹⁸

⁹⁴ Ibid.

⁹⁵ Forbes. Amanda Myers. “As Cities Begin Banning Natural Gas, States Must Embrace Building Electrification Via Smart Policy”. Jul 22, 2019.

<https://www.forbes.com/sites/energyinnovation/2019/07/22/as-cities-begin-banning-natural-gas-states-must-embrace-building-electrification-with-smart-policy/?hcb=1&sh=dbee346ce6fa>

⁹⁶ Data response to Energy Division dated 7/17/20 at 1.

⁹⁷ PG&E’s Greenbook EMWP, page 2, dated 8/15/17, states that “Mobile home pedestal shall have a minimum rating of 100 amps.”

⁹⁸ Secondary underground distribution cables are used to run power from a pad mounted transformer to splice boxes. The cables are rated for installation in underground conduit or directly buried in earth. These are distinct from service cables, which run from the splice boxes to each individual motorhome.

and service cables at Idlewild MHPs.⁹⁹ PG&E is working with mobilehome park owners to replace infrastructure like-for-like or to the minimum current service standard. The entirety of the service capacity that was available before the Camp Fire will be available through the Rebuild Program.¹⁰⁰ PG&E has planned, however, to incorporate an increase in conduit size within this program to accommodate future demand. PG&E has indicated that they are planning to install 3-inch" conduit that is capable of 200 amp cable in all replacement electrical infrastructure.¹⁰¹ PG&E is "installing 3-inch" conduit within the MHPs in the event that there are upgrades in the future."¹⁰²

Under the proposed agreement, the owner of a newer manufactured home with electric appliances requiring more than 100 amps would need to either request a service modification through the Rebuild Program or submit a Rule 15 application. The added cost for this service modification then would be at the MHP owner's expense.

Below, we address the concerns of the above mentioned protests related to 200 amp service, taking into consideration the likelihood of benefits resulting from providing service at the 200 amp service level, and the prospective costs of these upgrades before and after reconstruction.

In analyzing the cost of providing upgraded service, we differentiate between the Rebuild Program program's marginal cost of upgrading service from 100 to 200 amps for a single motorhome mobilehome and the marginal cost that would be incurred by upgrading service for all mobilehomes within a MHP.

Marginal Cost of Providing 200 Amp Service to a Single Mobilehome

Changing the service for a single mobilehome from 100 amps to 200 amps involves providing larger service cables from the splice box to the mobilehome electric pedestal and an electric pedestal that is capable of safely providing 200 amps to the mobilehome. An electric pedestal for a 200 amp service comes with

⁹⁹ Ibid.

¹⁰⁰ Ibid.

¹⁰¹ Email response from PG&E on 11/10/2020.

¹⁰² Email response from PG&E dated 8/26/20.

a 200 amp main circuit breaker and bus bars that are built for this service rating. The conductor and pedestal can be provided at the time of installation as an upgrade, or after the initial installation as a retrofit.

If done as an upgrade at the time of installation, the cost associated with the change in service cable is proportional to the distance between the splice box and pedestal, which is driven by the site layout of that mobilehome park. For the purposes of this analysis, we are assuming an average service cable length of 100 feet (100'), based on staff review of a PG&E sample electrical drawing of a MHP layout.

PG&E indicated that the difference in material cost per foot between a 200 amp and a 100 amp cable, including sales tax, handling, and freight, is approximately \$0.77 per foot.¹⁰³ The material cost of the service cable in the upgrade scenario would be \$77 per mobilehome. The labor cost difference between installing a 100' section of service cable that is rated for 100 amps versus a section rated for 200 amps is assumed to be de minimus.¹⁰⁴

The cost of providing an upgrade to a 200 amp pedestal is more than the cost of installing a comparable 100 amp pedestal. ED staff consultations with electrical suppliers indicate that the wholesale price of the 200 amp pad mounted pedestal may be up to 35% higher than the price of the pad mounted 100 amp pedestal. This is presumed to be due to higher manufacturing cost of 200 amp rated

¹⁰³ Data presented to Energy Division staff during a meeting on August 7, 2020.

¹⁰⁴ PG&E uses a Triplex 600-volt, USE-2, 1/0 AWG, aluminum conductor with crosslinked polyethylene insulation for 100 amp service cable and uses an identical cable with 4/0 AWG conductor and 1/0 AWG neutral for 200 amp service cable. The weight difference between 100' of these two cables is approximately 29 lbs.

The material cost of a 100-foot 200-amp service cable is approximately \$242 including sales tax, handling, and freight according to a data response from PG&E dated 8/24/20. Cost savings may be gained through economies of scale if multiple spaces are upgraded at the same time.

In a 11/20/2020 response to a data request inquiry about marginal labor cost for installing 200 amp cables within a MHP, PG&E stated that "After talking to the vendor, he was not able to give me a definitive answer as the cost difference is probably several hrs more for labor, which is probably not significantly more at this point."

hardware. The cost difference in the labor required for pedestal installation is assumed to be de minimus.

Therefore, the incremental cost to economically install service infrastructure capable of a 200 amp instead of 100 amp service for each space eligible for this program and not yet completed is principally driven by service cable costs and is estimated to be approximately \$96,789.¹⁰⁵ This figure is equivalent to approximately 0.14% of the total projected cost of the Rebuild Program¹⁰⁶

Having analyzed the incremental cost of upgrading service infrastructure from 100 to 200 amps under the Rebuild Program, we now turn to the incremental cost that would be incurred by providing this service as a retrofit later. In addition to monetary costs, the MHP owner and operator would also need to submit an application for PG&E or its contractor to handle both the electric cable and pedestal upgrade under PG&E's Rules 2 and 16.

PG&E estimates the total labor and material cost to retrofit the service cable from 100 amp to 200 amp after the Rebuild Program is concluded would be approximately \$1,250 per mobilehome.¹⁰⁷ **Therefore, it would be more than 16 times more expensive to retrofit the 200 amp service cable after the Rebuild Program than it would be to upgrade it as a part of the program.**¹⁰⁸

PG&E's estimate for retrofitting an existing installation's 100 amp electric pedestal with a new 200 amp electric pedestal is approximately \$3,300 per

¹⁰⁵ The conduit in this section is already capable of housing a 200-amp electric cable. The difference in cost/foot between a 200-amp and a 100 amp cable including sales tax, handling, and freight is approximately \$0.77 per foot. So, assuming an average of 100 feet from a splice box to the electric pedestal, the additional cost per mobilehome is approximately \$77. There are 27 MHPs submitted applications with a total of 1,257 spaces. The total incremental cost is \$96,789 (1,257 spaces * \$77/space).

¹⁰⁶ $\$96,789 / 68,066,426.69 = 0.14\%$.

¹⁰⁷ Data response to Energy Division dated 11/18/20, indicates that the labor and material cost to upsize the service cables for 24 mobilehomes to 200-amp service is approximately \$30,000. Hence, each service cable retrofit would cost approximately \$1,250.

¹⁰⁸ $\$1,250 \text{ after the program} / \$77 \text{ before the program} = 16.23 \text{ times}$

mobilehome.¹⁰⁹ Therefore, the total retrofit cost from 100 amp to 200 amp service (both cable and pedestal) upgraded as a part of the Rebuild Program would be \$4,550 per mobilehome.

It is likely that a future upgrade to 200 amp service would be cost prohibitive.

The CPUC concludes that the long run benefits of serving the increased demand of modern and all-electric mobilehomes outweighs the incremental costs of service cable capable of 200 amp service. Benefits include the monetary savings of the mobilehome owners realized by not requiring a subsequent electrical upgrade, reduction of greenhouse gas emission and air pollution, and lowering of impacts on the electric grid through the ability to shift load to times of lower demand.

Upgrading the service cable during the Rebuild Program (instead of after) would save the mobilehome owners who want to upgrade to 200 amp service a considerable amount of money for the service cable. That is, a mobilehome owner does not have to pay for the material and labor costs to remove an existing 100 amp service cable and reinstall a new 200 amp service cable at a later date. Also, as discussed above, electric appliances are more energy efficient and would save the mobilehome owner's money in cost of operations over the lifetime of the appliances.

Service cable upgrades also prepare mobilehome owners to upgrade to 200 amp service and use all-electric mobilehomes. Energy efficient appliances would eliminate energy waste and would lead to reduced greenhouse gas emissions. Electrifying residential space and water heating also provides the ability of the mobilehome owners to shift energy consumption in time to support grid needs.

¹⁰⁹ \$600 of material cost and \$2,700 of labor cost.

Furthermore, as mentioned in R.19-01-011¹¹⁰, electric corporations have limited ability¹¹¹ to offer increased incentives to customers who agree to make permanent decarbonization investments when rebuilding damaged homes.¹¹² The Rebuild Program is an opportunity for PG&E to incentivize mobilehome owners to acquire modern or all-electric mobilehomes through an extra 0.14% investment at the construction phase of the program.

The above benefits also would complement our long term decarbonization goals as specified in Senate Bill (SB) 1477 (Stern - 2018) and Assembly Bill (AB) 3232 (Friedman - 2018).¹¹³ The experience gained by the service cable upgrade also could contribute information to Phase II of R.18-04-018 for MHP utilities conversions and the building decarbonization rulemaking (R.19-01-011) as a measure to consider on new construction in areas damaged by wildfires. PG&E is instructed to provide underground service cable rated to serve a minimum of 200 amps from the splice boxes to the electric pedestal of each mobilehome¹¹⁴.

¹¹⁰ The Commission initiated Rulemaking (R.)19-01-011 on January 31, 2019, to begin crafting policy regarding building decarbonization in California pursuant to Senate Bill (SB) 1477 (Stern, 2018).

SB 1477 calls on the CPUC to develop, in consultation with the California Energy Commission, two programs (Building Initiative for Low Emissions Development (BUILD) and Technology and Equipment for Clean Heating (TECH) aimed at reducing greenhouse gas emissions associated with buildings.

¹¹¹ After past wildfires, electric corporations have offered increased energy efficiency incentives to customers going beyond current codes when rebuilding. However, these programs have had limited ability to fund investments for homes and businesses to be all-electric or pursue other decarbonization strategies.

¹¹² R.19-01-011 at 14

¹¹³ AB 3232 calls on the Energy Commission to, by 2021, develop an assessment of the feasibility of reducing the greenhouse gas emissions of California's buildings 40 percent below 1990 levels by 2030, working in consultation with the CPUC and other state agencies.

¹¹⁴ This Resolution recommends the section of underground cable from the splice box to the electric pedestal to be rated at 200 amps. The conduit in this section is already

Marginal Cost of Providing 200 Amp Service to an Entire MHP

While the cost of providing service cables capable of 200 amp service is a small percentage of the total Rebuild Program costs, transformer and secondary infrastructure costs to upgrade entire MHPs to 200 amp service could be substantial¹¹⁵. Providing an entire MHP with 200 amp service could also necessitate an upgrade of the secondary cables and conduit feeding the splice boxes within a MHP. These upgrades also have the potential to require an upgrade to the sizing and quantities of distribution transformers and their corresponding protective devices. PG&E stated that 100 KVA is the maximum transformer size for the MHP programs. PG&E normally uses a combination of 50 KVA and 100 KVA transformers in MHP layout and 25 KVA may be an option.¹¹⁶

With the previously noted exception of the service cable, PG&E should rebuild the destroyed utilities to the currently applicable service standard and the Rebuild Program will not serve as an upgrade program to provide 200 amp service to the entire MHP.¹¹⁷ Hence, sections 6.1.5. and 6.1.6. of the Butte County Mobilehome Park Rebuild Program Agreement remain unchanged.¹¹⁸ However,

capable of housing a 200-amp electric cable. The difference in cost/foot between a 200-amp and a 100 amp cable including sales tax, handling, and freight is approximately \$0.77 per foot. So, assuming an average of 100 feet from a splice box to the electric pedestal, the additional cost per mobilehome is approximately \$77. The cost of providing 200-amp service cable using the same assumptions is approximately \$1,250.

¹¹⁵ The electric infrastructure costs to upgrade entire MHPs to 200-amp service are more difficult to quantify since the number of spaces, MHP layouts, and load requirements differ between MHPs. The site-specific needs would affect the distribution and possibly transmission electric infrastructure requirements and their associated upgrade costs.

¹¹⁶ Data response to Energy Division dated August 24, 2020.

¹¹⁷ PG&E shall rebuild all existing electric utilities up to the splice box for 100 amp service unless the park had above 100 amp service before destruction from the Camp Fire.

¹¹⁸ Section 6.1.5. reads: "PG&E will design and install the "To-the-Meter" facilities to accommodate a service equivalent to the previous service. If the previous electric

Footnote continued on next page

PG&E shall update the Butte County Mobilehome Park Rebuild Program Agreement to indicate that the service cables from the splice box to the mobilehome electric pedestal shall be capable of safely providing 200 amps to the mobilehomes in the Rebuild Program.

Given the existence of 200 amp capable cable and conduit, PG&E should consider no-cost and low-cost options to supply 200 amp service to mobilehomes. PG&E should calculate the amount of excess capacity available from the transformers and secondary distribution system contemplated to provide a minimum of 100 amp service to each mobilehome.

This calculation of excess capacity should be used to determine the maximum number of mobilehomes in each MHPs that can be provided 200 amp service without triggering substantial system upgrades.¹¹⁹ To the extent feasible, PG&E should work with MHP owners and operators to determine which spaces would most benefit from a 200 amp service and allow those spaces to install 200 amp pedestals and panels. If upgrades to the secondary distribution system would enable a greater number of 200 amp services without necessitating a transformer upgrade, that option should also be considered and presented to the MHP Owner and discuss in the annual reports.

service was less than 100 amperes, the utility will design and install “To-the-Meter” facilities to accommodate 100 ampere service as part of the MHP Rebuild Program.” Section 6.1.6. reads: “With the exception of the 100 ampere minimum electric service, any requests for service upgrades or relocations beyond what is being provided by the MHP Rebuild Program will be handled under PG&E’s current Rules and Tariffs.”

¹¹⁹ Transformer sizing can be affected by voltage drop, flickering, climate zone, park layout, and customer loads, etc. Therefore, the amount of system upgrade required to upgrade all spaces to 200 amps varies by mobilehome locations. The Commission will not define a threshold for substantial system upgrade. But upgrades that do not involve larger and additional distribution transformers, trenching, and possible secondary distribution upgrades are not considered substantial.

MHP Owner/Operator Beyond-The-Meter Work Completion Deadline

MHP owners and operators are not optimistic about quickly repopulating their MHPs with new residents and indicate that Section 9.1.1.3¹²⁰ of the Butte County Mobilehome Park Rebuild Program Agreement should be deleted. This section references the only portion of the work contemplated under the Rebuild Program that the MHP owner may be responsible for, the beyond-the-meter work of installing the meter pedestals. Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP have indicated in their protests that “it will take many years to repopulate our parks with mobilehomes and residents living in them.”¹²¹ Because the MHP owners and operators still need to install other beyond-the-meter equipment, and may do so gradually as the MHP is repopulated, MHP owners and operators might not be “ready to receive service” from PG&E within twelve (12) months of the execution of the agreement. Therefore, it is not reasonable for PG&E to cancel or suspend the Butte County Mobilehome Park Rebuild Program Agreement based on this condition.

PG&E also anticipates that it will take about three years to engineer and rebuild the utility infrastructure for the mobilehome parks affected by the Camp Fire, assuming all requirements and permits are obtained within a reasonable time frame from the various agencies.¹²² The CPUC finds that thirty-six months after execution of the agreement should be adequate time for the MHP owners and operators to install the electric pedestals. This is the only portion of the beyond-the-meter work that is needed in order for the MHP Owner to be ready to receive service from PG&E. Therefore, the Rebuild Program does not need to be extended for a decade or more, as requested by the protestants, because the electric pedestals and gas meters can be installed before the MHPs are fully repopulated.

¹²⁰ Section 9.1.1.3. reads: “The failure or inability of the MHP Owner/Operator to complete the work and be ready to receive service from PG&E within twelve (12) months of the execution of this Agreement; or”

¹²¹ Protests of Forest Glenn MHP, Pheasant Ridge Mobile Estate, Pine Springs MHP, and Ridgewood MHP at 1

¹²² PG&E AL 4116-G/5581-E at 2

PG&E agreed with the MHP owners that beyond-the-meter services may not be ready within 12 months of the execution of the Butte County Mobilehome Park Rebuild Program Agreement.¹²³ PG&E indicated that it would submit a supplemental Advice Letter to 4116-G/5581-E to remove Section 9.1.1.3.

PG&E has not filed a supplemental Advice Letter to 4116-G/5581-E.

This Resolution requires PG&E to submit a Tier 1 supplemental compliance Advice Letter within 30 days of the effective date of this Resolution updating the Butte County Mobilehome Park Rebuild Program Agreement. PG&E shall honor its previous commitment and strike section 9.1.1.3 from this updated Agreement.

Sections of the Butte County Mobilehome Park Rebuild Program Agreement on Duration of the Rebuild Program

These protestants also suggested that PG&E should revise Section 10.6 of the agreement to formally acknowledge that the Rebuild Program will be an active program for a decade or more while the MHPs in Butte County are repopulated.¹²⁴

PG&E anticipates that it will take about three years to engineer and rebuild the utility infrastructure for the mobilehome parks affected by the Camp Fire, assuming all requirements and permits are obtained within a reasonable time frame from the various agencies.¹²⁵ CPUC also believes that thirty-six months after execution of the agreement should be adequate time for the MHP owners and operators to install the electric pedestals. Although the MHP owners still

¹²³ PG&E reply to protest at 3

¹²⁴ Section 10.6 of the agreement reads: "As soon as practicable and after any jurisdictional authorities have inspected and approved operation of the "Beyond-the-Meter" work, the MHP Owner/Operator may submit invoices to PG&E for "Beyond-the-Meter" work. Invoices submitted shall be submitted in no less than twenty-five percent (25%) increments based on the number of converted MH-Space compared to the total number of eligible MH-Spaces at the MHP. The final reimbursement for the "Beyond-the-Meter" work will be paid to the MHP Owner/Operator after the final commission has been completed and the entire MHP is ready to receive direct PG&E service."

¹²⁵ PG&E AL 4116-G/5581-E at 2

need to install other beyond-the-meter equipment beyond the electric pedestals to be ready to receive service from PG&E, the Rebuild Program does not need to be extended for a decade or more, as requested by the protestants, because the electric pedestals and gas meters can be installed before the MHPs are fully repopulated.

Furthermore, to avoid any misunderstanding of the MHP owner and operator related to the beyond-the-meter scope of work, Section 10.6 of the Butte County Mobilehome Park Rebuild Program Agreement also shall be revised to clearly show that beyond-the-meter work is not reimbursable except for the installation of the electric pedestal.

Sections of the Butte County Mobilehome Park Rebuild Program Agreement on Indemnification Clause

MHP owners and operators also requested PG&E to revise Section 12 of the Butte County Mobilehome Park Rebuild Program Agreement to achieve a more balanced indemnification clause. Since this indemnification clause is also included in the CPUC-approved Butte County Mobilehome Park Utility Upgrade Program Agreement (Form 79-1165) and has been included in executed contracts in the MHP Pilot for many years, Section 12 of the Butte County Mobilehome Park Rebuild Program Agreement should remain unchanged. We note that PG&E is already responsible for the “active gross negligence or willful misconduct of PG&E”, as stated in the indemnification clause.

Policy Precedent for Similar Disasters

Of the 36 MHPs in the Rebuild Program, only one had fully converted to direct utility service under the MHP Pilot. This MHP’s to-the-meter electric and gas distribution systems belongs to PG&E. However, there are also other direct-metered and master-metered MHPs in the Rebuild Program.¹²⁶ The beyond-the-meter distribution systems of the master-metered MHPs are private property.

¹²⁶ PG&E stated in a data response dated 5/11/21, that approximately 62% of the electric mobilehome spaces and 48% of the gas mobilehome spaces in the Rebuild Program are direct-metered. Therefore, approximately 38% of the electric mobilehome spaces and 52% of the gas mobilehome spaces in the Rebuild Program are master-metered.

PG&E initiated the Butte County mobilehome park rebuild effort in 2019 and has not indicated whether it will seek recovery for these costs.

PG&E also indicated that it wants to implement the use of the agreement as soon as practicable despite PG&E's current uncertainty over whether its costs will be recovered. The Rebuild Program, as proposed, allows PG&E to continue the work with defined project scopes for the loss of these private properties. PG&E is not required to retrofit construction in progress as of the effective date of this resolution or mobilehome parks completed through the Butte County Mobilehome Park Rebuild Program to satisfy the requirements set forth in this Resolution. However, approval of this Advice Letter does not set a precedent on how the CPUC would authorize project scopes and track expenses in similar disasters in the future since the scope of the rebuild effort is unique.

CONCLUSION

Based on the factors weighed above, the CPUC approves with modifications the request to establish a Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) with this Resolution.

This Resolution finds reasonable the following protest proposals:

- PG&E shall have discretion to place electric and gas utility routes according to the needs of this program and are not required to place them in the streets. PG&E shall take into consideration the most economic, convenient, and efficient service route in which utilities could be better positioned with respect to the mobile homes, considering the park's other constraints, and away from the street.
- PG&E shall develop a strategy to avoid service routes that might damage salvageable non-energy utilities, such as by crossing septic system leach fields. PG&E shall implement the minimum measures as discussed under the heading "*Damage to Existing Salvageable Utilities and Underground Facilities*" in the "Discussion" section of this resolution.
- Section 6.5.4 of the Butte County Mobilehome Park Rebuild Program Agreement shall be revised to read: "PG&E shall not remove the existing legacy system owned by the MHPs, unless removal is necessary and the MHP owner's permission has been obtained. PG&E shall ensure that the new and the existing legacy systems are both electrically and physically isolated from each other. PG&E shall not

- incur any expenses associated with the removal or retirement of the existing system owned by the MHP owners under the MHP Rebuild program. Should removal of the legacy distribution system owned by the MHP owners be necessary to complete the MHP Rebuild program, such costs may at PG&E's discretion be included in the MHP Rebuild Program if it is necessary and can be done so efficiently."
- PG&E should remove section 9.1.1.3 of the Butte County Mobilehome Park Rebuild Program Agreement which currently reads: "The failure or inability of the MHP Owner/Operator to complete the work and be ready to receive service from PG&E within twelve (12) months of the execution of this Agreement; or".

This Resolution rejects the following proposals submitted in protests:

- Electric service should be at least 150 amps or 200 amps. Rebuild Program is not intended to provide utility service upgrades, but to install infrastructure that provides either the same level of utility service found at the MHP prior to the impact of the Camp Fire or service meeting current utility standards (a minimum of 100 amps) and applicable code. However, the CPUC concludes that the long-term benefits outweigh the incremental cost for PG&E to provide underground service cable rated to serve a minimum of 200 amps from the splice boxes to the electric pedestal of each mobilehome.¹²⁷
- Gas and electric meters should be placed toward the rear of the carport instead of the front of the mobilehomes. The CPUC concludes that gas meters and electric utility pedestals should be placed according to PG&E's Electric and Gas Service Requirements (Greenbook) unless PG&E exercises its discretion to deviate from those requirements.
- PG&E should formally acknowledge that the Rebuild Program will be an active program for a decade or more while the MHPs in Butte County are repopulated. Beyond-the-meter work is not reimbursable except for the electric pedestal and PG&E shall revise section 10.6 of the

¹²⁷ Section 5.3.2 of the proposed Butte County MHP Rebuild Program Agreement indicates that "PG&E will normally design and install a single phase, 120/240 volts, 100-ampere electric meter service equipment at each individual MH-Space. Any requests for service modifications beyond the 100-ampere electric service or relocations beyond what is being provided by the MHP Rebuild Program will be handled under PG&E's current Rules and Tariffs."

- Butte County Mobilehome Park Rebuild Program Agreement to clearly show that beyond-the-meter work is not reimbursable except for installation of the electric pedestal. Given the ability to complete the gas meter and electrical pedestal work ahead of mobilehome repopulation, the Rebuild Program does not need to be extended for a decade or more.
- Upon completion of the rebuild effort, PG&E should remove legacy utility owned infrastructure.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review. Please note that comments are due 20 days from the mailing date of this resolution. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

PG&E, Ridgewood MHP, and Forest Glen MHP filed comments on the Resolution. Ridgewood MHP filed comment on May 2, 2021. PG&E and Forest Glen filed their comments on May 3, 2021.

Comments were primarily related to 1) the relevancy between the Rebuild Program and the MHP Pilot; 2) extending to-the-meter eligibility to permanent fixed foundation residential structures; 3) pedestal installment ahead of Mobilehome repopulation; 4) remittance of insurance claim payment to the Rebuild Program; 5) coordination with non-energy service providers on rebuild and upgrade participation; 6) providing 200 amp service; 7) abandonment of underground PG&E assets; 8) placement of the electric and gas utility with consideration for alternate routes, setback requirements, and strategy to avoid damage to non-energy utilities; 9) approval of excavation plan; 10) indemnification of PG&E on negligence and misconduct; 11) direct-metered versus master-metered service; 12) reply to comment procedure; and 13) implementation of Resolution requirement in the existing Rebuild Program.

Relevancy between the Rebuild Program and the MHP Pilot

Forest Glen MHP commented that this Resolution uses the MHP Pilot as a template on the Rebuild Program. Forest Glen MHP also indicated that the MHP Pilot is irrelevant to the Butte County's needs. The MHP Pilot is applicable to populated parks in Butte County whereas the Rebuild Program "has a clean slate except for existing utilities and configuration".¹²⁸

The Commission agrees that the needs of the MHP owners in these two programs might be different. We will continue our effort to address the specific needs of the Butte County MHP owners in the following discussion of comments.

Extending to-the-meter eligibility to permanent fixed foundation residential structures

Forest Glen MHP commented that "PG&E should be required to replace ALL of the service lines and equipment that was destroyed in the fire, whether they were in mobile spaces or in common areas."¹²⁹

Ridgewood MHP also commented that "There were other electrical services destroyed by the Camp Fire; i.e. street lighting and septic tank pumps in my MHP for example. These services should be replaced by the Rebuild Program."¹³⁰

PG&E also requested that the Commission allow them to continue extending to-the-meter services to permanent fixed foundation residential structures as part of the Rebuild Program.¹³¹ PG&E indicated that this would meet PG&E's commitment to rebuild utility infrastructure that was damaged due to the CAMP fire. PG&E also indicated that "While other applications can complete these services independent to the Butte County Mobilehome Park Rebuild Program, it is more cost efficient and timely for PG&E to complete these services under the same program as PG&E can leverage minimal handoffs and resource synergies

¹²⁸ Comment of Forest Glen MHP at 1

¹²⁹ Comment of Forest Glen MHP at 2

¹³⁰ Comment of Ridgewood MHP at 2

¹³¹ Comment of PG&E at 3

available to complete the work when compared to completing these services under an alternative application.”¹³²

The Commission agrees that to-the-meter eligibility should be extended to permanent fixed foundation residential structures in this program. PG&E also is not prohibited from performing rebuild work beyond the scope specified in D.20-04-004. However, this work will not be recoverable through rates.¹³³

Pedestal Installment ahead of Mobilehome Repopulation

Forest Glen MHP commented on Section 10.6 of the Butte County Mobilehome Park Rebuild Program Agreement regarding installation of the electric pedestal. They considered this requirement as “a welcome change” in the Resolution.¹³⁴

Remitment of insurance claim payment to the Rebuild Program

Forest Glen MHP commented that it is not a mastered-meter park and had no insurance coverage on PG&E owned gas and electric lines.¹³⁵

Ridgewood MHP also commented that insurance claim remitment is a problematic requirement. It offers the following points of consideration:¹³⁶

1. Most insurance policies have general coverages and it could be difficult to separate electric and gas service coverages from other non-energy utilities coverages.
2. It could be difficult to implement this requirement when electric and gas utilities were installed by both PG&E and the MHP owner.
3. If the insurance utility coverage for electric and gas services can be separated and remitted to PG&E, would PG&E reimburse the MHP owners for the cost of insurance premiums that were paid over the years?

¹³² Comment of PG&E at 3

¹³³ Order Paragraph (OP) 9 is revised to reflect this change.

¹³⁴ Comment of Forest Glen MHP at 1

¹³⁵ Ibid.

¹³⁶ Comment of Ridgewood MHP at 2

4. Mortgagee of a MHP who has the first rights to the insurance proceeds would have to agree to this requirement.
5. A MHP owner might have paid taxes or reinvested the funds from the insurance proceeds.
6. It is questionable whether PG&E has the right to the insurance proceeds.

The Commission agrees with the points brought up by Ridgewood MHP and recognizes the challenges to equitably administering this requirement. Therefore, the Commission will waive the insurance remittance requirement as specified in the original OP 8 of this resolution.¹³⁷

Coordination with non-energy service providers on rebuild and upgrade participation

Forest Glen MHP commented on the high cost to allow Comcast lines to install in PG&E trenches. They stated that “I asked my PG&E contractor about the feasibility of allowing Comcast lines in the PG&E trenches. I was quoted an approximate cost of \$400,000 to allow that.”¹³⁸

Glen Fuller, member of the Ridgewood MHP also commented that he has “heard from several park owners in the process of rebuilding that Comcast is quoting an extremely high price to provide cable service for which there was no cost in the past to the park owner. I can only surmise that PG&E’s quoted cost for trench sharing is discouraging this practice. In my opinion PG&E should offer this service “at cost” and not for “cost recovery” to cable and internet suppliers and also to park owners for routing the power for street lighting.”

¹³⁷ The original OP 8 states that “The Butte County Mobilehome Park Rebuild Program applicants shall be required to provide an attestation that they either (1) do not have insurance covering electrical or natural gas infrastructure damage resulting from the Camp Fire or (2) will remit any amount resulting from an insurance claim on damage to existing infrastructure being replaced by the Butte County Mobilehome Park Rebuild Program due to the Camp Fire to the Butte County Mobilehome Park Rebuild Program. An mobilehome park owner shall be required to file insurance claims on utility infrastructure and reimburse the amount of payment resulting from those insurance claims on utility infrastructure to the Butte County Mobilehome Park Rebuild Program.”

¹³⁸ Comment of Forest Glen MHP at 2

The Commission will not respond to allegations without a record of the specific facts of the projects. PG&E may request non-energy utilities to pay for their fair shares of the joint trench costs and MHP owners to pay for providing electric service to streetlights according to the applicable tariffs.

Providing 200-amp Electric service

Ridgewood MHP commented that “Why not just require 200 Amp service or set criteria such that the park owner can contribute a reasonable amount to make it happen; i.e. at worst case the park owner contributes only the material cost delta between what is proposed under this revised rebuild program and a full 200A service.”¹³⁹

On the other hand, PG&E expressed concerns that the 200 amp service cable upgrade would provide “overbuilding infrastructure and installing potentially hazardous infrastructure while completing the Butte County Mobilehome Park Rebuild Program.”¹⁴⁰

There seem to be misconceptions of the intent of the Resolution by the parties. This Resolution does not require PG&E to upgrade all mobilehomes to 200 amp service. But it does require PG&E to upgrade service cables to prepare for future 200 amp service upgrades.¹⁴¹ PG&E also shall evaluate the maximum number of 200 amp services that can be supported by the contemplated transformers and distribution infrastructure. The level of transformer infrastructure contemplated for this program is equal to the level in place prior to the Camp fire. While there may be minor upgrades required to secondary distribution infrastructure to safely accommodate 200 amp services, this need has yet to be established. PG&E shall work with mobilehome park owners and operators to the extent feasible to determine which spaces, within the maximum number that can be supported by the contemplated infrastructure, would most benefit from a 200 amp service.

¹³⁹ Comment of Ridgewood MHP at 2

¹⁴⁰ Comment of PG&E at 3

¹⁴¹ After a meeting between Energy Division and PG&E on 5/11/21, PG&E followed up with a data response indicated that a 4/0 service cable which rated to serve a minimum of 200 amps can also serve a 100 amp electric pedestal. Although the splice boxes for the service cables also might have to be upgraded to a large size, but the cost differential would be negligible compares to the overall savings of a later service cable replacement.

If PG&E were to provide 200 amp services to all residences of the mobilehome parks, PG&E would have to redesign the distribution systems of the mobilehome parks to determine needed electric infrastructure upgrades. This would be a major redesign project and would take a considerable amount of PG&E's time and resources. Furthermore, this might require upgrades to the primary and secondary cable infrastructures and installations of additional transformers. Therefore, difference in material and labor costs could be substantial and this work is not directed by this resolution.¹⁴²

Abandonment of underground PG&E's assets

PG&E indicated that its standard safety practice is to remove or de-energize electric cables and purge and cap gas pipes. The asset is not removed but is recorded in PG&E's records as decommissioned and released from liability. PG&E desires and requests that it be allowed to continue this abandonment standard practice as this additional scope was not factored in PG&E's plan in Advice Letter 4116-G/5581-E. PG&E notes that this change would potentially double the cost PG&E originally estimated for the Rebuild Program.¹⁴³

PG&E stated that approximately 62% of the electric mobilehome spaces and 48% of the gas mobilehome spaces in the Rebuild Program are direct-metered.¹⁴⁴ Therefore, there could be a considerable amount of utility assets required and costs associated with their removal. The Commission agrees that PG&E may

¹⁴² PG&E shall determine the necessary distribution system upgrades based on voltage drop, flickering, climate zone, park layout, and diversification in electricity demand, etc., of each MHP to determine the maximum number of 200 amp services that can be supported by the contemplated transformer and distribution infrastructure. The information needed to determine if the infrastructure is adequate to support 200-amp services is outlined in PG&E's Electric Design Manual. MHP owners may refer to PG&E's Unit Cost Guide updated in April 2021 to get a general idea of the overhead, labor, and material costs associated with upgrading their electric services. PG&E's Unit Cost Guide can be found at: https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/interconnection-renewables/Unit-Cost-Guide.pdf

¹⁴³ Comment of PG&E at 2

¹⁴⁴ Data response to Energy Division on 5/11/21

continue its standard practice regarding abandoning underground assets and removes the original OP 4¹⁴⁵.

Placement of the electric and gas utility with consideration for alternate routes, setback requirements, and strategy to avoid damage of non-energy utilities.

Forest Glen MHP commented that they were told that “utility routes were required to be in the street. This has been making it very difficult to stay away from leach field, as our original PG&E lines ran at the back of each space.”¹⁴⁶ Forest Glen MHP also indicated that “setback of gas and electric lines from other utilities was previously 3’[feet] but it had been changed to 10’[feet] during this rebuild. Again, significant impact on my septic and leach field system.”¹⁴⁷

Ridgewood also indicated that “trenches in the street and meters in front of the homes is acceptable for a 3 star or lower rated park¹⁴⁸ but esthetically unacceptable for higher rated parks.”¹⁴⁹

Ridgewood MHP further indicated that “The criteria for evaluating alternate routes gives no weight to the Park Owners preferences or other park related constraints. I propose rather then: “utilities could be closer to the mobile homes” the criteria be “better positioned with respect to the mobile homes considering the park’s other constraints””.¹⁵⁰

¹⁴⁵ The original OP 4 states that “Upon completion of the rebuild effort, PG&E shall remove the existing utility- owned assets that are not in use. PG&E shall not be responsible for removing assets that are not PG&E owned.”

¹⁴⁶ Comment of Forest Glen MHP at 1

¹⁴⁷ Ibid.

¹⁴⁸ Ridgewood MHP refers to the Woodall one to five star rating system. There is a detailed description of the Woodall star rating system at: http://www.pbvillage.com/Mobile_Home_Park_Star_Ratings.pdf.

¹⁴⁹ Comment of Ridgewood MHP at 2

¹⁵⁰ Comment of Ridgewood MHP at 1

Ridgewood MHP also supported the idea of requiring PG&E to develop a strategy to avoid service routes that might damage salvageable non-energy utilities.¹⁵¹

PG&E indicated in its comment that it is aware of at least a dozen mobilehome units in parks that are fully enclosed by salvageable utilities such as leach fields or septic systems and other wet utilities.¹⁵² The current configurations at these mobilehome units do not provide PG&E the clearance PG&E needs to install gas and electric utility infrastructure based on current utility standards. PG&E requests direction from the Commission on how to proceed with rebuild of facilities affected by the location of these mobilehome units if PG&E is to avoid service routes that may damage salvageable utilities. As there are no mobilehomes currently occupying the known mobilehome lots that are fully enclosed by salvageable utilities, PG&E proposes that the MHP owners either relocate the salvageable utilities, or that they re-configure the mobilehome lots in order to provide PG&E the necessary clearance PG&E needs to safely install and operate gas and electric utility infrastructure.¹⁵³

The Commission is aware of the intricacy of placing new electric and gas underground utilities while avoiding damaging existing salvageable non-energy utilities. PG&E confirmed in a data response to Energy Division that the Joint Trench Configurations & Occupancy Guide (Utility Standards (UO) S5354 Exhibit B) requires 3 feet horizontal separation between PG&E facilities and other “wet” utility lines; and 10 feet separation for leach fields, leach lines, and septic system.¹⁵⁴ However, the latest revision of Elec-038193 standard¹⁵⁵ made an exception for MHPs only that allows for the crossing of leach fields if a 10 foot separation cannot be maintained. This exception is only applicable to electric

¹⁵¹ Ibid.

¹⁵² Comment of PG&E at 2

¹⁵³ Ibid.

¹⁵⁴ Data response to Energy Division on 5/11/21. (UO) S5354, Exhibit B was dated 9/27/2006.

¹⁵⁵ UG-1 General Green Book 038193 Standard: Minimum Requirements for Design and Installation of Electric Conduit, Insulated Cable, and Facilities, dated 12/17/2020.

only trenches.¹⁵⁶ Furthermore, meter locations may be placed in front or at the left front of the mobilehomes.¹⁵⁷

Therefore, the Commission agrees with Ridgewood MHP that PG&E should take into consideration of the other constraints of the MHPs when evaluating alternate routes.¹⁵⁸ However, since the configurations and terrains of each MHP are different, the Commission does not offer specific direction to PG&E on how to proceed with rebuild of utilities of these mobilehome units in order to avoid service routes that may damage salvageable utilities. The Commission encourages PG&E to negotiate with the MHP owners to either relocate the salvageable utilities or reconfigure the mobilehome lots in order to provide PG&E the necessary clearance.

Approval of excavation plan

PG&E indicated that most projects under the Rebuild Program have significant sub-surface conflicts, such as privately owned utilities, and due to the nature of rural geographic properties, such as trees and boulders.¹⁵⁹ In most cases, mobilehome park (MHP) owners and operators are not fully aware of the subsurface conflicts on their property. PG&E indicated that given the confined space of a mobilehome park, there may not be many options to design the excavation plan. PG&E designs the construction and excavation plan based on PG&E's standards with a focus on safety as MHP owners may not have the expertise to fully understand the complexity of the subsurface infrastructure and various challenges. PG&E further stated that the MHP owners may inadvertently cause unnecessary additional work activity that increases the cost and duration of the project. PG&E desires to minimize further construction

¹⁵⁶ Data response to Energy Division on 5/11/21.

¹⁵⁷ Ibid.

¹⁵⁸ OP 2 is changed to: "PG&E shall have discretion to place electric and gas utilities routes according to the needs of this program and are not required to place them in the streets. PG&E shall take into consideration the most economic, convenient, and efficient service route in which utilities could be ~~closer to the mobilehomes~~ *better positioned with respect to the mobile homes, considering the park's other constraints, and away from the street.*

¹⁵⁹ Comment of PG&E at 1

delays construction and intends to avoid any unnecessary impacts to existing or salvageable underground infrastructure that are in working, unknown, or untraceable conditions. PG&E recommends that the Commission not adopt the requirement that requires PG&E to obtain excavation plan approval from a MHP owner and operator.¹⁶⁰

The Commission agrees with PG&E to waive the excavation plan approval requirement. However, the Commission shall require PG&E to consult with the MHP owners on the excavation plan.

Indemnification of PG&E on negligence and misconduct

Forest Glen MHP commented that “**Active gross negligence or willful misconduct**” provides virtually no protection to park owners. Negligence or misconduct would be a more fair and balanced approach.”¹⁶¹

Ridgewood MHP also commented that ““**Active gross negligence or willful misconduct**” is setting the bar too high. Negligence or misconduct would be more realistic terminology to use to ensure PG&E takes its responsibility seriously.”¹⁶²

PG&E has incorporated the indemnification clause from the Mobilehome Park Utility Upgrade Program Agreement (Form 79-1165) into the Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201). The indemnification clause in the Butte County MHP Program agreement is essentially identical¹⁶³ to the clause already approved by the Commission for reconstruction projects in D.20-04-004. There is no record to support changing the language through this Resolution.

Direct-metered versus master-metered service

¹⁶⁰ Ibid.

¹⁶¹ Comment of Forest Glen MHP at 2 (Emphasis added by protestant).

¹⁶² Comment of Ridgewood MHP at 4 (Emphasis added by protestant).

¹⁶³ PG&E notes that the only difference in the entire indemnification clause is the substitution of “program” for “conversion.”

Forest Glen MHP commented on the statement in the Resolution related to master-metered service prior to the utilities conversion provided by the Rebuild Program.¹⁶⁴ Forest Glen indicated that “each resident had their service with PG&E directly.”

Ridgewood MHP also commented that their MHP residents’ electric and gas services were metered and billed directly by PG&E. Electrical and gas service was supplied by PG&E to banks of meters. The park installed and maintained the distribution system from the meter banks to the individual mobile home sites. The meter banks were owned by the park whereas the meters in the meter banks were owned by PG&E.¹⁶⁵

The Commission acknowledges the comments and this Resolution has been revised to reflect the number of master-metered spaces in existence before the Rebuild Program.

Reply to comment procedure

Ridgewood MHP questioned “why should the utility being regulated have the last word in a dispute with a citizen of the state.” They further suggested that “Section 7.4.3 of General Order (GO) 96-B needs to be modified to provide citizens an opportunity to rebut the regulated utilities inadequate response.”¹⁶⁶

Ridgewood MHP’s response to PG&E’s reply to protest focused on the upgrade of electrical service to 150/200 amps, installation of wire/vaults in the street and pedestals in front of the mobile homes, and potential damage to salvageable utilities. While the Commission appreciates Ridgewood MHP’s restatement of their concerns on these issues, we find that Ridgewood MHP’s response is duplicative of earlier comments and the Commission does not find it necessary to include these comments in the record.

Implementation of Resolution requirement in the existing Rebuild Program.

¹⁶⁴ Comment of Forest Glen MHP at 2

¹⁶⁵ Comment of Ridgewood MHP at 3

¹⁶⁶ Ibid.

PG&E requested that the changes adopted in the Draft Resolution apply to projects that are yet to complete design. PG&E indicated that its standard process is to apply changes to projects that have yet to complete design and requested that changes adopted in this Draft Resolution follow the same PG&E process. PG&E has completed design on a portfolio of projects. If the changes from this Draft Resolution are to be applied to projects that have completed design and yet to begin construction, PG&E states that it would need to redesign several projects. They state that the redesign may further increase cost and time to project competition.

A data request response from PG&E indicated that 18 MHPs have completed design, one MHP design is in progress (on hold due to MHP owner's request), and 17 MHPs have not yet begun design.¹⁶⁷ Please refer to Appendix B for a detailed break down of the mobilehome design status. Since this Resolution only requires upgrade of the service cable and possibly the associated splice boxes, the Commission finds that it is reasonable to require PG&E implement these changes to all the MHPs in the Rebuild Program that had not commenced construction as of the initial publication date of this resolution

FINDINGS

1. PG&E 4116-G/5581-E seeks approval to establish a Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) for MHP owners and operators in Butte County.
2. PG&E's Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) describes the work being performed by PG&E and the MHP owners and operators' designated contractor in restoring the utility service to the MHP in Butte County.
3. The Rebuild Program does not cover new developments - rather it is focused on restoring service and replacing facilities for 36 MHPs, representing approximately 1,652 spaces, that lost service or had electric and gas facilities damaged or destroyed due to the Camp Fire.

¹⁶⁷ Data response to Energy Division on 5/11/21.

4. There are 8 mobilehome parks, representing approximately 395 spaces, that have yet to submit a formal application for the Rebuild Program.¹⁶⁸
5. The Rebuild Program does not cover beyond-the-meter conversions except the electric pedestals.
6. PG&E stated that construction was in progress, but no spaces were completed in 2019. PG&E stated that they had incurred a total cost in 2019 of \$2,751,424.80 for design and construction work in the Rebuild Program.
7. PG&E indicated that it completed 110 spaces in 2020 with a total expenditure of \$13,301,768.89. PG&E plans to complete 478 spaces in 2021 at a projected cost of \$18,013,233, 244 spaces in 2022 and 103 spaces in 2023. PG&E anticipates spending approximately \$34 million for 2022 and beyond. The total expenditure is projected to be \$68,066,426.69.
8. PG&E's projection indicates that the Rebuild Program per space cost is expected to be more than 50% higher than PG&E's to-the-meter per space cost in the MHP Pilot.
9. PG&E proposes to use 3-inch Polyvinyl Chloride (PVC) conduits instead of its standard 2-inch PVC conduits for MHP 100 amp service. PG&E states that this is to enable a future upgrade to 200 amp service without having to install new conduit.
10. There were approximately 4,000 manufactured housing units delivered across the state of California in 2019 and approximately 50% of them were all electric.
11. The CPUC concludes that the potential benefits outweigh the incremental cost for PG&E to provide underground service cable rated to serve a minimum of 200 amps from the splice boxes to the electric pedestal of each mobilehome. Potential benefits to enabling modern mobilehomes through the Replacement Program include a reduction in operating costs for the mobilehome owners, avoiding costs that would be incurred for post-program

¹⁶⁸ Apple Tree Village, Canyon View Estates, Holly Hills Mobile Estates, Hudsons MHP, Paradise TP, Rocky Lane MP, The Plantation, and The Woodlands MHP have not submitted an application.

electric service upgrades, reduction of greenhouse gas emissions and air pollution, and enabling the mobilehome owner to participate in demand response programs to support grid needs.

12. The CPUC should anticipate demand for 200 amp services to increase due to the increased load imposed by electric space conditioning, water heating, and cooking equipment found in modern mobilehomes.
13. The CPUC concludes that the potential benefits of providing 200 amp service justify directing PG&E to evaluate pedestal and secondary system configurations that would provide additional 200 amp services at low or no additional cost.
14. The Rebuild Program is modeled after the MHP Pilot , but there are some differences that have been incorporated to tailor and expedite the needs of the Rebuild Program such as removing the requirement for applicant prioritization and the coverage of service to any habitable or useable structure on the MHP property.
15. There were ten protested issues by MHP owners and operators. These issues are related to utility configuration, electric capacity, preservation of existing underground sewage systems, removal of legacy infrastructure, and language within the Butte County Mobilehome Park Rebuild Program Agreement. The CPUC finds that there is a need to modify the Butte County Mobilehome Park Rebuild Program Agreement to address the protests.
16. PG&E, Ridgewood MHP, and Forest Glen MHP filed comments on the Resolution. Comments were primarily related to 1) the relevancy between the Rebuild Program and the MHP Pilot; 2) extending to-the-meter eligibility to permanent fixed foundation residential structures; 3) pedestal installment ahead of Mobilehome repopulation; 4) remittance of insurance claim payment to the Rebuild Program; 5) coordination with non-energy service providers on rebuild and upgrade participations; 6) providing 200 amp service; 7) abandonment of underground PG&E's assets; 8) placement of the electric and gas utility with consideration for alternate routes, setback requirements, and strategy to avoid damage of non-energy utilities; 9) approval of excavation plan; 10) indemnification of PG&E on negligence and misconduct; 11) direct-metered versus master-metered service; 12) reply to

comment procedure; and 13) implementation of Resolution requirement in the existing Rebuild Program.

17. PG&E indicates that there is currently adequate management and overhead staff, and civil resources are being added or reallocated as necessary to simultaneously support both the Rebuild Program and the MHP Conversion Program at full capacity.
18. PG&E should continue to notify and coordinate with primary jurisdiction (*e.g.*, city or county) and non-energy service providers who serve MHPs scheduled for utility rebuild and who could participate in installing or upgrading their facilities in conjunction with the Rebuild Program work. Coordination should be done in a manner which benefits CPUC regulated gas and/or electric utility customers.
19. PG&E has not indicated whether it will seek rate recovery for the Rebuild Program costs.
20. Given the uncertainty in cost recovery, PG&E should track costs in a manner similar to that used by the MHP Upgrade program.
21. As this Resolution responds to a Tier 2 Advice Letter filing, it does not grant any authority to track the Rebuild Program expenditures within existing memoranda accounts or to establish any new memoranda accounts.
22. The CPUC should approve PG&E's Advice Letter 4116-G/5581-E with modifications to allow PG&E to continue the current effort to expeditiously rebuild the utility infrastructure and allow the residents to move back into the mobilehome parks.

THEREFORE IT IS ORDERED THAT:

1. The request of Pacific Gas and Electric Company to establish a Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) for mobilehome park owners and operators in Butte County as requested in Advice Letter 4116-G/5581-E is approved with modifications.
2. PG&E shall have discretion to place electric and gas utilities routes according to the needs of this program and are not required to place them in the streets.

PG&E shall take into consideration the most economic, convenient, and efficient service route in which utilities could be better positioned with respect to the mobile homes, considering the park's other constraints, and away from the street.

3. PG&E shall develop a strategy to avoid service routes that might damage salvageable non-energy utilities, such as by crossing septic system leach fields. PG&E shall implement the minimum measures as discussed under the heading "*Damage to Existing Salvageable Utilities and Underground Facilities*" in the Discussion section of this resolution.
4. Section 6.5.4 of the Butte County Mobilehome Park Rebuild Program Agreement shall be revised to read: "PG&E shall not remove the existing legacy system owned by the MHPs and the system shall be abandoned in place unless removal is necessary and the MHP owner's permission has been obtained. PG&E shall ensure that the new and the existing legacy systems are both electrically and physically isolated from each other. PG&E shall not incur any expenses associated with the removal or retirement of the existing system owned by the MHP owners under the MHP Rebuild program. Should removal of the legacy distribution system owned by the MHP owners be necessary to complete the MHP Rebuild program, such costs may at PG&E's discretion be included in the MHP Rebuild Program if it is necessary and can be done so efficiently."
5. PG&E shall remove section 9.1.1.3 of the Butte County Mobilehome Park Rebuild Program Agreement which currently reads: "The failure or inability of the MHP Owner/Operator to complete the work and be ready to receive service from PG&E within twelve (12) months of the execution of this Agreement; or"
6. PG&E shall revise section 10.6 of the Butte County Mobilehome Park Rebuild Program Agreement to clearly show that beyond-the-meter work is not reimbursable except for installation of the electric pedestal. Given the ability to complete the gas meter and electrical pedestal work ahead of mobilehome repopulation, the Butte County Mobilehome Park Rebuild Program does not need to be extended for a decade or more.
7. The Butte County Mobilehome Park Rebuild Program Agreement shall require each participating mobilehome park owner who operates on leased real property to submit proof of a valid lease for a minimum of 20 years from the date that the Butte County Mobilehome Park Rebuild Program Agreement is executed by PG&E.
8. PG&E shall include all applicable changes of the Mobilehome Park Utility Upgrade Program Agreement (Form 79-1165) specified in D.20-04-004 of R.18-

04-018 to the Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) as discussed under the heading “*Alignment with the MHP Decision (D.) 20-04-004*” in the “Discussion” section of this resolution.

9. PG&E shall extend to-the-meter eligibility to common use buildings and permanent fixed foundation residential structures. PG&E also is not prohibited from performing rebuild work beyond the scope specified in D.20-04-004. However, this work will not be recoverable through rates.
10. PG&E shall not extend to-the-meter eligibility to recreational vehicle (RV) spaces.
11. PG&E shall provide underground service cable and conduit rated to serve a minimum of 200 amps from the splice boxes to the electric pedestal of each mobilehome and update the Mobilehome Park Rebuild Program Agreement to reflect this requirement.
12. PG&E shall evaluate the maximum number of 200 amp services that can be supported by the contemplated transformer and distribution infrastructure, work with mobilehome park owners and operators to the extent feasible to determine which spaces would most benefit from a 200 amp service, and allow for the installation of 200 amp rated pedestals and configuration of the secondary distribution system according to Rule 2 and Rule 16 to those spaces, to the extent feasible.
13. PG&E shall evaluate whether upgrades to the secondary distribution system would enable a greater number of 200 amp services without necessitating a transformer upgrade and present feasible options to the mobilehome park owner and discuss in the annual reports.
14. PG&E shall continue to notify and coordinate with primary jurisdiction (*e.g.*, city or county) and non-energy service providers who serve mobilehome parks scheduled for utility rebuild and who could participate in installing or upgrading their facilities in conjunction with the Butte County Mobilehome Park Rebuild Program work. Coordination should be performed in a manner which benefits CPUC regulated gas and/or electric utility customers.
15. PG&E is not required to retrofit construction in progress as of the effective date of this resolution or mobilehome parks previously completed through the Butte County Mobilehome Park Rebuild Program to satisfy the requirements set forth in this Resolution.
16. PG&E shall use the template in Table 1 of Appendix A to report to-the-meter and beyond-the-meter data of the Butte County Mobilehome Park Rebuild Program. Both public and confidential versions of the annual report shall be submitted to Energy Division (ED) and Safety and Enforcement Division

(SED) by March 1st of each year until the closing of the Butte County Mobilehome Park Rebuild Program.

17. PG&E shall submit a Tier 1 supplemental compliance Advice Letter within 30 days of the effective date of this Resolution for the updated Butte County Mobilehome Park Rebuild Program Agreement (Form 79-1201) in accordance with the requirements set forth in this Resolution.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on May 20, 2021; the following Commissioners voting favorably thereon:

RACHEL PETERSON
Executive Director

Appendix A

Table 1: Annual Report Data Template for 2019 – 2024

Annual Report Template ¹⁶⁹		Per-year costs (not cumulative)					
		2019	2020	2021	2022	2023	2024
Descriptor							
Program Participation							
CARE ¹⁷⁰ /FERA ¹⁷¹ enrollment	Number of individuals enrolled in CARE/FERA after the conversion						
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion						
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 535 map.						
Rural Community ¹⁷²	Number of converted spaces within rural community						

¹⁶⁹ PG&E indicates in AL 4116-G/5581-E that the Butte County Mobilehome Park Rebuild Program is anticipated to last 3 years. However, PG&E should report annual cost incurred until completion of this program.

¹⁷⁰ California Alternate Rates for Energy (CARE)

¹⁷¹ Family Electric Rate Assistance (FERA)

¹⁷² The Census Bureau identifies two types of urban areas:

- Urbanized Areas (UAs) of 50,000 or more people;
- Urban Clusters (UCs) of at least 2,500 and less than 50,000 people.
- “Rural” encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is: <https://www.census.gov/geo/reference/urban-rural.html>.

Urban Community (if any) ¹⁷³	Number of converted spaces within urban community						
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)						
Completed Spaces	Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.						
Number of TO-THE-METER MH ¹⁷⁴ and Covered Common Area Locations Converted (Gas)							
Number of TO-THE-METER MH and Covered Common Area Locations Converted (Electric)							
Cost Information							
To-The-Meter - Capital Costs							
Construction Direct Costs							
Civil/Trenching	To the Meter construction costs for civil related activities						
Electric							
Gas							
Gas System							
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)						

¹⁷³ *ibid.*

¹⁷⁴ To-the-Meter Mobile Home (TTM MH)

Material / Structures	Pipes, fittings, and other necessary materials required for gas construction						
Design/Construction Management	Cost for engineering, design, and construction inspection cost						
Electric System							
Labor	Cost for installation of distribution electric assets, pre-inspection testing, decommissioning of legacy system (Electric design cost was previously incorporated here)						
Material / Structures	Cables, conduits, poles, transformers, and other necessary materials for electrical construction						
Design/Construction Management	Cost for engineering, design, and construction inspection cost						
Other							
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations						
Other Labor (Internal) ¹⁷⁵							
Non-Labor	Permits						
Materials	Meters, modules, and regulators						
Program - Capital Costs	Costs that are driven by utility specific business models or cost accounting practices. These costs should be separated out so that others do not compare costs that are not comparable with others.						

¹⁷⁵ Provide as many labor cost lines with descriptions as needed to clarify types of labor included in project.

Project Management Costs							
Project Management Office (PMO)	Program management office costs (Project management, program management, schedulers, cost analysts and field engineers)						
Outreach							
Property Tax	Property tax on capital spending not yet put into service						
AFUDC ¹⁷⁶	AFUDC is a mechanism in which PG&E can recover the financing cost of its construction activities. AFUDC starts when the first dollar is recorded on the project and ends when HCD ¹⁷⁷ completes the first inspection so that the new assets are in use by the residents.						
Other							
Labor (Internal) ¹⁷⁸							
Non-Labor	Utility specific overhead driven by corporate cost model						
Sub-Total Capital Cost							

To-The-Meter - Expense Costs							
Project Management Costs							
Project Management Office (PMO)	Program startup cost						

¹⁷⁶ Allowance for Funds Used During Construction (AFUDC)

¹⁷⁷ California Department of Housing and Community Development (HCD)

¹⁷⁸ Ibid 93.

Outreach	Outreach efforts to educate Mobilehome Park (MHP) Owners and operators, residents, government, and local agencies about the program						
Other							
Labor (Internal)	Program startup cost for supporting organizations						
Other Labor (Internal) ¹⁷⁹							
Design/Construction Management	Training Cost for engineering, design, and construction inspection cost						
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project						
Cancelled project cost							
Sub-Total To-The-Meter							
Beyond-The-Meter - Capital	Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and PG&E to reimburse the MHP owners						
Civil/Trenching	NA						
Electric System							
Labor	Labor and material for installing beyond-the-meter Electric Pedestal (e.g., foundation, meter protection, grounding rods)						
Material / Structures	Number of Electric Pedestals installed						

¹⁷⁹ Ibid 93.

Other	Beyond-The-Meter Permits, including HCD fees						
Other Labor (Internal) ¹⁸⁰							
Sub-Total Beyond-The-Meter							
Total To-The-Meter & Beyond-The-Meter							

¹⁸⁰ Ibid 93

Appendix B

Table 2: Design Status by MHP Provided by PG&E on 5/11/2021.

Park Name	IFC Design Status
FOREST GLEN MHP	Design Complete
FOREST GROVE MOBILE HOME	Design Complete
J AND M	Design Complete
OAK HILL ESTATES	Design Complete
PINE RIDGE PARK	Design Complete
SKYWAY TRAILER COURT	Design Complete
ACRES OF PARADISE MHP	Design Complete
BLUE HAVEN MOBILE ESTATES	Design Complete
BLUE SPRUCE MOBILE ESTATES	Design Complete
EL DORADO MOBILE ESTATES	Design Complete
PONDEROSA MOBILE ESTATES	Design Complete
EDGEWOOD ESTATES/SAWMILL ESTATES	Design Complete
IDLEWILD	Design Complete
PARADISE MOBILE ESTATES	Design Complete
PINE GROVE MHP	Design Complete
QUAIL TRAILS VILLAGE	Design Complete
SHERWOOD FOREST MHP	Design Complete
HOLLY HILLS MOBILE ESTATES	Design Complete
EVERGREEN MHP	Design in Progress - 9/5/19
SKYWAY VILLA MHP	Not Started Design - Scheduled 5/17/21
BIG BEND MHP	Not Started Design
BUTTE CREEK MHP	Not Started Design
PHEASANT RIDGE MOBILE ESTATES	Not Started Design
PINE SPRINGS MHP	Not Started Design
PINECREST MHP	Not Started Design
RIDGEWOOD MH	Not Started Design
CAPE COD MOBILE ESTATES	Not Started Design
LIME SADDLE MOBILE ESTATES	Not Started Design
APPLE TREE VILLAGE	No PG&E App Received
CANYON VIEW ESTATES	No PG&E App Received
PARADISE TP	No PG&E App Received
PINE VIEW HEIGHTS MHP	No PG&E App Received
ROCKY LANE MP	No PG&E App Received

THE PLANTATION		No PG&E App Received
THE WOODLANDS MHP		No PG&E App Received
HUDSONS MOBILE HOME PARK		No PG&E App Received
Design Complete	18	
Design in Progress	1	It is on hold due to MHP owner's request
Not Started Design	No PG&E App Received	17