

Decision 24-12-037 December 19, 2024

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

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

Rulemaking 18-04-018

**DECISION ADOPTING A 200-AMP ELECTRICAL SERVICE STANDARD AND  
ESTABLISHING PROGRAM EVALUATION CRITERIA FOR THE  
MOBILEHOME PARK UTILITY CONVERSION PROGRAM**

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APPENDIX A - Mid-Program Evaluation Criteria

**DECISION ADOPTING A 200-AMP ELECTRICAL SERVICE STANDARD AND ESTABLISHING PROGRAM EVALUATION CRITERIA FOR THE MOBILEHOME PARK UTILITY CONVERSION PROGRAM**

**SUMMARY**

This decision adopts a 200-amp standard for the existing Mobilehome Park Utility Conversion Program and adopts the mid-program evaluation criteria attached to this decision as Appendix A, which the Commission staff will use to review the Mobilehome Park Utility Conversion Program. The Commission will consider establishing and Mobilehome Park electrification pilot in a future decision.

Rulemaking 18-04-018 remains open.

**1. Background**

Climate change is exerting enormous change on the planet and prompting strategies to reduce carbon use or “decarbonize” national and global commerce. Limiting or eliminating the use of fossil fuels in buildings is a key component to building decarbonization. Building decarbonization refers to various approaches for reducing greenhouse gas emissions in buildings. One key strategy is to convert fossil fuel end uses to fully electric ones. California has identified building decarbonization as a key strategy to meeting its long-term climate goals.<sup>1</sup> For residential structures, like single-family homes, apartment complexes, manufactured homes and mobile homes,<sup>2</sup> electrification would replace natural gas appliances such as stoves and furnaces with their electric equivalents.

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<sup>1</sup> For example, the 2022 California Air Resources Board (CARB) Scoping Plan identifies building decarbonization as a central strategy for California to achieve carbon neutrality by 2045. CARB also approved plans to implement a zero-emission standard for space and water heating appliances beginning in 2030.

<sup>2</sup> Manufactured and mobile homes refer to homes built on a permanent chassis, constructed in a plant, and transported to an installation site. Manufactured homes refer to homes built after

*Footnote continued on next page.*

Decarbonization in transportation is also accelerating at a rapid rate and as California consumers transition to electric vehicles (EVs), it is important to prepare homes, including manufactured homes, for EV charging. The Commission is tasked with exploring what electric service standard will allow MHPs to accommodate full-home electrification and EV charging. Furthermore, exploring the costs and barriers associated with full Mobilehome Park (MHP) electrification will provide critical information to support residential building electrification more broadly.

### **1.1. Procedural Background**

Effective January 1, 1997, state law required the direct metering of electric and/or natural gas service in MHPs constructed within an electric or gas corporation franchise.<sup>3</sup>

On August 20, 2010, the Western Manufactured Housing Communities Association (WMA) filed a petition to adopt, amend, or repeal a regulation pursuant to Public Utilities (Pub. Util.) Code<sup>4</sup> Section 1708.5.

On February 24, 2011, the Commission issued its Order Instituting Rulemaking (R.)11-02-018 for the transfer of Master-Meter/Submeter Systems at MHPs and manufactured home communities to electric and gas corporations. Opening Comments were filed April 8, 2011.

On March 13, 2014, the Commission issued Decision (D.) 14-03-021 approving a three-year pilot program for master-meter conversion.

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June 15, 1976, when the federal Department of Housing and Urban Development's Manufactured Home Construction and Safety Standards went into effect. Mobile homes refer to homes built before June 15, 1976. This decision uses the term "manufactured homes" to refer to both manufactured and mobile homes.

<sup>3</sup> Pub. Util. Code § 2791(c).

<sup>4</sup> All future section and code references are to the Public Utilities Code unless otherwise stated.

Comments were filed on March 3, 2014, and Reply Comments were filed on March 10, 2014.

On September 28, 2017, Resolution E-4878 extended the pilot program till December 31, 2019.

On April 26, 2018, the Commission issued R.18-04-018 to evaluate the MHP Pilot Program which was previously established in D.14-03-021 to incentivize MHPs with master-metered natural gas and electricity systems to convert to direct utility electric service.

On March 14, 2019, Resolution E-4958 extended the MHP Pilot Program to December 31, 2021.

On April 16, 2020, the Commission adopted D.20-04-004 and established a 10-year MHP Utility Conversion Program (UCP) to run from 2021 through 2030, with rules and targets based on evaluation results from the MHP Pilot Program. The utilities participating in this program are Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas), Southern California Edison Company (SCE), Southwest Gas Corporation (SWG), San Diego Gas and Electric Company (SDG&E), Pacific Power (PacifiCorp), Bear Valley Electric Service Company (BVES), and Liberty Electric Company (Liberty).

On December 23, 2020, the Commission issued a Scoping Memo for Phase 2 of the Rulemaking to address consumer protection issues, establish an electric service standard, and develop a pilot exploring the full electrification of a selected MHP.

On February 12, 2021, the Administrative Law Judge issued a ruling regarding consumer protection issues. Comments were filed March 15, 2021, and Reply Comments on March 29, 2021.

On August 19, 2021, the Commission approved D.21-08-025 adopting consumer protection measures for MHP residents.

On July 31, 2023, the assigned Administrative Law Judge (ALJ) issued a ruling with a staff proposal responding to Phase 2B issues and affording the parties an opportunity to file comments.

On September 24, 2024, SDG&E, SWG, PG&E, SCE, BVES, Liberty, PacifiCorp, and SoCalGas filed comments responding to the ALJ ruling.

### **1.2. Submission**

This matter was submitted on September 24, 2024, when parties filed their comments.

## **2. Jurisdiction**

The Commission shares jurisdiction over MHPs with the California Department of Housing and Community Development (HCD). HCD oversees the permitting for most electric infrastructure in existing MHPs. The California Pub. Util. Code §§ 4351 through 4361 give the Commission jurisdiction over the safety of master-metered natural gas systems in MHPs. In January 1995, Assembly Bill 766 (Hauser) adopted PU Code §§ 4451 through 4465, giving the Commission jurisdiction over the safety of propane master tank distribution systems serving two or more customers within a MHP, or 10 or more customers outside of a MHP.

The Gas Safety and Reliability Branch (GSRB) of the Commission enforces Federal Pipeline Safety Regulations through audits of jurisdictional MHP and propane master tank systems. Audits consist of reviewing operation and maintenance records, evaluating emergency procedures, and performing field inspections of the gas distribution facilities. If violations are

found, GSRB suggests corrective measures to be taken within a specified time. If the operator fails to comply, a citation and fine may result.<sup>5</sup>

The MHP UCP is a Commission initiated program that applies to all investor-owned utilities (IOUs). Non jurisdictional entities like publicly owned utilities (POUs) do not participate. However, there may be some MHPs that receive gas or electric service from a POU and receive master-metered electric or gas service from an IOU through the MHP owner. These parks, though served in part by an POU, are eligible to participate, as they have a master-metered gas or electric system that can be converted to direct IOU service.

Although the Commission has the sole responsibility to inspect jurisdictional propane systems and the authority to issue citations, it does not have the same ratemaking jurisdiction over propane companies that it has with natural gas companies. Therefore, propane systems in MHPs are not eligible for replacement through the MHP UCP. However, MHPs with propane systems can still be eligible for electric system replacement through the MHP UCP, so long as they are master-metered and receive electricity from an IOU.

### **3. Issues Before the Commission**

The Phase 2 Scoping Memo and Ruling, issued December 23, 2020, identified the following Phase 2 issues:

- Whether the CPUC should adopt an electrification-ready standard for electrical service for the MHP Program?
- What electrical service standard is appropriate?

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<sup>5</sup> See Code Section 4357(b)(1).

- What cost categories, inputs, and assumptions should be used to evaluate the costs of electrification-ready standards for the MHP Program?
- What impact would adoption of an electrification-ready standard exert on environmental and social justice (ESJ) communities.

The Phase 2 Scoping Memo, Section 2.3 – Possible “Track 2” Pilot Program, leaves open the possibility to develop a full MHP electrification pilot, once consumer protection issues and an electrification-ready service standard have been addressed.

#### **4. Electrification Ready Electrical Service Standard**

##### **4.1. Staff Proposal**

In July 2023, Energy Division staff (Staff) issued the R.18-04-014 Phase 2B Staff Proposal (Staff Proposal). The Staff Proposal reviewed the existing MHP UCP and recommended adoption of a 200-amp electrical service standard and a limited full-home electrification initiative.

The current MHP UCP installs new, IOU-owned electrical infrastructure delivering 100-amp service to all manufactured homes in the MHP. The new infrastructure is divided into “to-the-meter” (TTM) and “behind-the-meter” (BTM) components. The TTM infrastructure includes all components of the distribution system within the MHP, including but not limited to transformers, distribution cables, conduit for the cables, splice boxes, and the electric meter used to measure a home’s electricity usage. The relevant IOU will own, operate, and maintain all TTM infrastructure; the MHP owner will own and maintain the BTM infrastructure. In the context of the MHP UCP, BTM infrastructure includes everything beyond the meter and up to and including the point of connection to the manufactured home. This includes the electrical pedestal where the meter is installed, conduit and cables leading from the pedestal to the manufactured



home, and the junction box, which holds the electrical connections into the manufactured home. The Staff Proposal shared the following conversion totals through the end of 2022.<sup>6</sup>

**Table 1: Spaces and Parks Converted, MHP Program through end of 2022<sup>7</sup>**

	PG&E		SDG&E		SCE		SoCalGas		SWG	
<b>Total # Spaces Converted</b>	12,991		7,521		17,648		22,534		1,597	
<b>2030 Target (# spaces)</b>	60,009		17,299		54,483		64,616		3,308	
<b>% Target</b>	22%		43%		32%		35%		48%	
<b>Total # Parks Converted</b>	158		65		268		303		25	
	# spaces	% total	# spaces	% total	# spaces	% total	# spaces	% total	# spaces	% total
<b>In DAC</b>	3,400	26%	0	0%	8,207	47%	10,036	45%	866	54%
<b>CARE/FERA</b>	4,130	32%	3,362	45%	8,279	47%	9,196	41%	528	33%
<b>Medical Baseline</b>	435	3%	373	5%	262	1%	75	0%	8	1%
<b>Urban</b>	10,326	79%	5,524	73%	17,350	98%	19,404	86%	1,525	95%
<b>Rural</b>	1,350	10%	0	0%	57	0%	0	0%	270	17%
<b>Total Conversion Costs</b>	\$482,267,113		\$216,794,143		\$266,556,764		\$206,472,539		\$18,784,929	
<b>Average Cost per space</b>	\$37,123		\$28,825		\$15,104		\$9,163		\$11,763	

A fully electrified home relies solely on electric appliances and will likely consume more electricity than the current dual-fuel conditions in existing

<sup>6</sup> R.18-04-014 Phase 2B Staff Proposal, July 25, 2023, at 17. These totals have changed since the Staff Proposal was first distributed.

<sup>7</sup> *Ibid.*

manufactured homes that use a combination of natural gas or propane and electricity. Furthermore, many newer manufactured homes feature 200-amp panels. To prepare manufactured homes for future full-home electrification and potential EV charging, it makes sense to increase the current 100-amp service standard in manufactured homes to a 200-amp service standard for both TTM and BTM infrastructure.

Additional factors driving the need for increased electrical service capacity for manufactured homes are the growing solar PV system and EV markets. California's recent ban on the sale of new gas-powered vehicles by 2035 will likely spur an increase in demand for in-home charging infrastructure, as EV owners demonstrate a strong preference for Level 2 charging at home.<sup>8</sup> While full-home electrification, EV charging, and/or solar PV systems can in most instances be installed on a 100-amp service, these electrification options can still trigger the need to increase the size of an electrical service, depending on the circumstance. Manufactured homeowners will face substantial cost if they choose to upsize their electric service at a later date. These costs can range from \$3,000-\$18,000, depending on site conditions, according to the Staff Proposal.<sup>9</sup>

Trends at the national level and in California point to embracing a 200-amp electric service standard for newly installed residential electric infrastructure for single-family dwellings.

At the national level the Staff Proposal mentioned an October 2021 joint Department of Energy (DOE) and Pacific Northwest National Laboratory Technical Brief that indicated most all-electric single-family homes (in the United

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<sup>8</sup> *Id.* at 25-26.

<sup>9</sup> *Id.* at 30.

States) will require at least a 200-amp electric service.<sup>10</sup> In California, existing Commission programs already include 200-amp electrical service as necessary for building and vehicle electrification. For example, D.22-04-036 in the Self-Generation Incentive Program (SGIP) includes provisions for investor-owned utilities (IOUs) to cover the costs for electrical service upsizing to the 200-amp level to accommodate the installation of heat pump water heaters (HPWHs). The San Joaquin Valley Affordable Energy Pilots (SJV Pilots), in R.15-03-010, explored efforts to fully electrify homes and upsized these homes to 200-amp electrical service to accommodate the homes' increased electric load and to prepare homes for future EV charging.<sup>11</sup> PG&E's Butte County Mobilehome Park Rebuild Program for customers who lost homes in the 2018 wildfires in Butte County includes TTM infrastructure at the 200-amp level.<sup>12</sup> Staff reiterated, however, that current research indicates that 200-amp service is not an absolute necessity for full home electrification, and should not be a default for home electrification retrofit scenarios. But, given that the MHP UCP already requires trenching and will install new electric infrastructure in a park, Staff recommended that this new infrastructure be built to modern standards to accommodate 200-amp service.<sup>13</sup>

The Staff Proposal's analysis found that increasing the MHP UCP electrical service standard from 100-amp to 200-amp would result in a minimal increase in per-space conversion costs for the existing MHP UCP. Using estimates provided by the IOUs in 2023, Staff concluded that the changes would result in a 0.8%-

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<sup>10</sup> *Id.* at 30.

<sup>11</sup> *Id.* at 33.

<sup>12</sup> *Id.* at 33.

<sup>13</sup> *Id.* at 71.

8.2% (\$141-\$887) increase in per-space costs for electric TTM infrastructure<sup>14</sup> and a 3.8%-8.4% (\$146-\$337) increase in per-space costs for electric BTM infrastructure.<sup>15</sup> In total, adoption of a 200-amp electrical service standard would lead to an increase of 1.7%-4.6% (\$478-\$1,118) in costs over the current 100-amp electrical standard installation costs for parks receiving both gas and electric system conversions.

Staff also point out that the costs to install higher capacity electrical infrastructure in the future could be cost-prohibitive due to the potential need for re-trenching. Trenching costs in the MHP UCP represented about 41.4% - 65.5% of all TTM electrical costs, or about \$5,315 - \$7,143 per space.<sup>16</sup> On the BTM side, Staff point out that labor costs to install new infrastructure make up about 50.7% - 84.1%, or about \$1,814 - \$2,954 per space, of total BTM electric system costs.<sup>17</sup>

Staff thus concluded that the benefits of increasing the electrical service standard to 200 amps, and thus future-proofing MHPs for potential home electrification, EV charging, and solar PV system installations, outweigh the marginal increase in costs of installing this new infrastructure. Furthermore, Staff explained that pursuing a higher electrical service standard now would avoid burdening manufactured home residents with potentially high costs should they need to upsize their service in the future. Staff recommended a one-year transition period for implementing this new standard. Lastly, Staff caveated their recommendation by noting that the recommendation for a 200-amp standard for home and vehicle electrification is specific to the MHP UCP, which already

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<sup>14</sup> *Id.* at 45.

<sup>15</sup> *Id.* at 51.

<sup>16</sup> *Id.* at 49.

<sup>17</sup> *Id.* at 54.

installs new electrical infrastructure. In contrast, in scenarios where homeowners add electrification loads to homes with existing electrical infrastructure, Staff encouraged the use of strategies to avoid service upsizing where possible, which can be costly both for the customer and ratepayers.

#### **4.2. Party Comments**

SCE agreed with the Staff recommendation to mandate the installation of TTM infrastructure to accommodate a 200-amp electrical service standard.<sup>18</sup> SCE's comments also supported the Staff Proposal's recommendation to mandate installation of 200-amp BTM infrastructure, up to the external junction box of each MHP coach.<sup>19</sup> SCE requested that the Commission factor in age or existing condition of a manufactured home before requiring a 200-amp standard for certain parks.<sup>20</sup>

WMA agreed with the Staff Proposal that 200-amp service be provided for both TTM and BTM infrastructure and mentioned that 100-amp service is inadequate. PG&E supported the recommendation to adopt a 200-amp standard for both TTM and BTM infrastructure. However, PG&E cautioned the Commission to consider an efficient transition period and openness to revisiting the 200-amp requirement if new load management techniques and technology emerge that alleviates the need for 200-amp service to achieve full electrification.<sup>21</sup> PG&E also requested that the Commission revisit the annual soft

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<sup>18</sup> Southern California Edison Company's (SCE Opening Comments) Opening Comments on Administrative Law Judge's Ruling Distributing Staff Proposal and Setting Schedule for Further Activities on Electrical Service Standards, August 23, 2023, at 3.

<sup>19</sup> SCE Opening Comments filed August 23, 2023, at 3.

<sup>20</sup> *Id.* at 4.

<sup>21</sup> Response of Pacific Gas& Electric Company (PG&E Response to ALJ Ruling) to Administrative Law Judge's Ruling Distributing Staff Proposal and Setting a Schedule for Further Activities on Electric Service Standards, August 25, 2023, at 1 and 2.

cost targets and annual conversion targets for the IOUs because shifting to a 200-amp standard will add to per-space conversion costs.<sup>22</sup> To track the actual costs of adopting a 200-amp standard, PG&E also recommends discrete reporting of costs related to this new standard to be recorded in the annual MHP UCP reports filed to the docket.<sup>23</sup>

SDG&E's comments supported the Staff Proposal's recommendation to install infrastructure to accommodate 200-amp electrical service TTM and BTM. Additionally, SDG&E's comments mentioned that increasing quantities of new manufactured homes are being produced with 200-amp panels, so applying a 200-amp standard will align with this manufacturing trend.<sup>24</sup>

Sonoma Clean Power Authority (SCP) and Peninsula Clean Energy Authority (PCE), collectively the Joint Community Choice Aggregators (CCAs) filed comments that generally support the Staff Proposal's recommendations to mandate the installation of 200-amp TTM and BTM infrastructure for all manufactured homes. The Joint CCAs' comments also stated that "200-amp service to mobile homes will become a necessity within the next two decades."<sup>25</sup>

SoCalGas and SWG acknowledged that mandating a 200-amp electrical service standard within MHPs aligns with the State's decarbonization goals and aims to provide residents with the flexibility to support their energy needs.<sup>26</sup>

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<sup>22</sup> *Id.* at 4.

<sup>23</sup> *Id.* at 3.

<sup>24</sup> San Diego Gas & Electric Company's Comments on Administrative Law Judge's Ruling Distributing Staff Proposal and Setting a Schedule for Further Activities on Electric Service Standards, August 23, 2023, (SDG&E's Opening Comments) at 1 and 2.

<sup>25</sup> Comments of Sonoma Clean Power Authority and Peninsula Clean Energy Authority (the Joint CCA's) on the Phase 2B Staff Proposal, August 23, 2023, at 2.

<sup>26</sup> Comments of Southern California Gas Company and Southwest Gas Corporation on R.18-04-018 Phase 2B Staff Proposal, August 23, 2023, at 2.

NRDC did not take a firm position on the electrical service standard, but urges the Commission to learn about energy loads and ways to avoid unnecessary electrical service upgrades and grid oversizing. They recommended adoption of the new standard now and suggested that the Commission review data to ensure this standard meets the needs of residents.<sup>27</sup>

PG&E's Reply Comments opposed recommendations from the Joint CCAs to reduce the adoption time for a 200-amp standard to six months. Instead, PG&E supported a two-year transition period to prevent redesign costs, rework costs, and conversion delays.<sup>28</sup> SCE's Reply Comments also urged the Commission to reject the Joint CCAs' suggestion to reduce the transition time to adopt the new 200-amp standard from one year to six months. SCE's Reply Comments also cited redesign costs, rework costs, and conversion delays as well as lengthy wait times for 200-amp pedestals due to supply chain issues.<sup>29</sup>

The Joint CCAs' Reply Comments rejected comments by SoCalGas and SWG that manufactured home upgrades do not necessarily need to be 200-amp and should be considered on a case-by-case basis, arguing that this would add costs to the program. Their comments urged the Commission to keep a 200-amp upgrade standard for all participating homes.<sup>30</sup>

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<sup>27</sup> Comments of Natural Resources Defense Council on the Administrative Law Judge's Ruling Distributing Staff Proposal and Setting A Schedule for Further Activities on Electric Service Standards, August 25, 2023, at 3.

<sup>28</sup> Reply Comments of PG&E to the Administrative Law Judge's Ruling Distributing Staff Proposal and Setting a Schedule for Further Activities on Electric Service Standards, September 22, 2023, at 2.

<sup>29</sup> SCE's Reply Comments on Administrative Law Judge's Ruling Distributing Staff Proposal and Setting Schedule for Further Activities on Electrical Service Standards, September 22, 2023, at 2.

<sup>30</sup> Reply Comments of Sonoma Clean Power Authority and Peninsula Clean Energy Authority on the Phase 2B Staff Proposal, September 22, 2023, at 4.

In their Reply Comments, SDG&E reported that it upsizes or increases the number of transformers based on the actual or expected load it needs to accommodate, and that installing 200-amp infrastructure will not necessarily immediately trigger transformer upgrades. However, SDG&E pointed out that if load increases and the distribution system becomes strained, and larger or additional transformers may be required. Moreover, SDG&E indicated that larger transformers may be located at further distances from homes, due to noise criteria. This may require more trenching work at a later date.<sup>31</sup>

### **4.3. Discussion**

After reviewing and weighing the concerns presented in party comments and the Staff Proposal, we adopt a 200-amp electrical service standard for the MHP UCP. As noted in party comments, adopting a 200-amp standard supports future building electrification, EV adoption, and solar PV system installations.

We emphasize that this newly adopted standard does not make any changes to the electrical infrastructure within existing homes and does not add load to the existing grid infrastructure. As SDG&E asserted in its Reply Comments, this means that this standard will not necessitate additional upstream grid costs, unless substantial new electric load is added in the future. As homes begin to electrify, this 200-amp standard will prevent the future need for costly electric service upsizing. While not all homes may need 200-amp service presently, the costs of upsizing this service in the future are far greater than the costs of installing 200-amp infrastructure upon initial installation through the MHP UCP. Older homes in MHPs will also eventually be replaced

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<sup>31</sup> Reply Comments of San Diego Gas & Electric on Administrative Law Judge's Ruling Distributing Staff Proposal and Setting a Schedule for Further Activities on Electric Service Standards, September 22, 2023 at 3.



with newer homes, many of which have 200-amp electrical panels built in. Additionally, as the Staff Proposal points out, the Department of Energy is pushing manufactured home companies to incentivize the Zero Energy Ready Home standards, which include the ability to accommodate solar PV systems. Thus, in anticipation of these newer homes being placed in MHPs, the Commission should ensure these MHPs are equipped to handle electrical needs of these newer manufactured homes.

The Commission emphasizes that installing 200-amp service should only be applied to cases in which new electrical infrastructure must already be installed, as part of the program, such as in the MHP UCP. However, the Commission asserts that in all other retrofit scenarios where electrical load is added to an existing building, and where the electric service line (or other electrical infrastructure) is not already being replaced, all possible measures should be used to avoid service line upsizing while still ensuring safety. As the Staff Proposal suggests, these measures could include choosing power-efficient appliances like low amperage devices or circuit sharing devices.<sup>32</sup>

The Commission declines to selectively apply this standard based on the age or condition of homes in parks, as suggested by SCE. Even if the existing homes within an MHP may be old or unable to easily accommodate full-home electrification, eventually these homes will be replaced with newer manufactured homes, which are more likely to be built with 200-amp electrical panels. These new homes should still have the option to fully electrify; thus, all mobile and manufactured home lots in MHPs participating in the MHP UCP should receive 200-amp service, regardless of the current condition of the homes occupying the

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<sup>32</sup> Staff Proposal, July 25, 2023 at 29.

MHP spaces. Common use facilities that are already connected to the MHP's master-meter system remain eligible for the program, as outlined in D.20-04-004, and shall receive at least 200-amp service, or with some flexibility to reasonably go above this service rating to adequately serve the needs of residents. Utilities will continue to cover the TTM costs of upgrading common use facilities' electric and gas infrastructure, but the MHP owner will remain responsible for any BTM upgrades and costs for these facilities.

We find it reasonable to follow PG&E's recommendation to revisit the 200-amp standard if new technologies are introduced to alter the need for this level of service to achieve the Commission's decarbonization goals, including full electrification. We thus direct each utility, at the conclusion of the MHP UCP in 2030, to produce a report in consultation with Energy Division Staff. The report may discuss the appropriateness of the 200-amp standard and any technological developments that may warrant a change to the electric service standard offered in the MHP UCP or future iteration of the program. Future iterations of the MHP UCP and funding for such programs will be contingent on submission of this report. These future programs should also take into account assessment of the appropriate electric service standard to serve converted MHPs.

As to the transition period to this new 200-amp standard, we acknowledge parties' various concerns: the desire to quickly shift to a higher electrical service capacity and ensure more MHPs receive 200-amp service and practical considerations such as ensuring availability of equipment and supply chain delays. Parties expressed desire for a range of durations, from six months to two years, as an appropriate transition period.

Balancing these considerations, we direct participating IOUs to commence adoption of a 200-amp electrical service standard no later than nine months after

the effective date of this decision for all MHPs that have not yet signed a MHP UCP agreement with an IOU. That is, if an MHP has already signed an MHP UCP agreement for 100-amp service prior to nine months from the effective date of this decision, the MHP can proceed with installation of 100-amp service to homes in the MHP. The MHP UCP agreement between IOUs and the MHP owner, as established in D.20-04-004 Ordering Paragraph 6 and Appendix C, must be revised to state that the installed electrical meter service for converted mobile homes will be 200-amp. The IOUs will work with Energy Division and SED staff to ensure the new MHP UCP agreement reflects all the changes outline in this decision.

However, if a MHP has not yet signed an MHP UCP agreement nine months after the effective date of the decision, the MHP and IOU must sign an MHP UCP agreement that specifies a new 200-amp service standard for all TTM and BTM electrical work currently covered in the MHP UCP.

We find that there is compelling justification to switch to this standard quickly, to ensure that MHPs are better equipped for the state's transition to home and vehicle electrification. A rapid transition is especially important for MHP residents, who tend to have lower income, and would have to potentially pay thousands of dollars out of pocket to upsize their service at a later period. While we acknowledge the need to ensure equipment availability, we believe that a nine-month transition period that applies only to MHPs that have not yet signed an MHP UCP agreement provides ample time for IOUs to communicate with suppliers and signal increased demand for equipment such as 200-amp pedestals. Signing the MHP UCP agreement occurs early in the conversion process, prior to design and construction, giving IOUs additional time to ramp up ordering supplies.

This 200-amp standard applies only to MHPs that have not yet been converted and does not apply retroactively to MHPs that have already signed MHP UCP agreements or have already completed design or construction.

As for reporting, we agree with PG&E that the actual costs for implementing a 200-amp service standard should be recorded in the annual MHP UCP reports filed on the docket card. We direct IOUs to use the existing cost reporting template, but to report program participation, completed spaces, and costs separately for (1) MHPs that are subject to the existing 100-amp service standard and (2) MHPs that are subject to the new 200-amp service standard for all future annual reports. We direct IOUs to work with the Commission's Safety and Enforcement Division (SED) to ensure that the reporting is clear and consistent across IOUs.

As for annual cost targets, we also agree with PG&E that this figure should be revisited once IOUs begin implementing the new 200-amp service standard in MHPs. The mid-program evaluation that will occur in 2025, as directed in D.20-04-004, is a good opportunity to reassess costs and conversion targets. We decline to set new targets in this decision, since doing so would be premature without actual installation cost data.

## **5. MHP UCP Mid-Program Evaluation**

On September 10, 2024, the ALJ issued a ruling seeking party comments that included a set of evaluation criteria for the 2025 mid-program evaluation for program years 2021 to 2024 that was directed in D.20-04-004. Parties were invited to comment on what changes should be made to the current program, any potential future program and whether the program should continue beyond 2030. The proposed evaluation plan questions from the ruling are as follows:

### **1. *Demand for the program***

- a. How many parks have applied to this program of the known/existing gas master-metered MHPs?
- b. At the current rate, what percentage of MHP applicants will be converted by 2030?
2. ***Progress, Conversion Targets, and Conversion Costs***
  - a. Have utilities met their annual and total conversion targets thus far? Why or why not?
  - b. Have utilities met their annual conversion cost targets? Why or why not?
  - c. What are the per-space (TTM and BTM) costs for electric and gas spaces?
  - d. How much progress has been made (% of total parks) to date regarding total parks converted?
  - e. How many parks chose not to participate in the program (those who submitted applications declining participate)?
3. ***Safety, Reliability, and Capacity Improvements***
  - a. What safety improvements has the program achieved?
  - b. Are there gaps in safety that still need to be addressed through this program?
  - c. How many parks have experienced an increase in electric capacity?
  - d. How has reliability of service changed as a result of this program?
4. ***Resident Access to Utility Programs***
  - a. How has access to CARE and Medical Baseline services changed?
  - b. How has access to energy management and conservation programs changed?

- c. Have there been other benefits realized by participants as a result of the program?
  - d. Are there ways to make these services/programs more accessible to newly converted residents?
5. *MHP Owner/Participant Experience*
- a. What challenges do MHP owners face in participating in this program?
  - b. What are positive aspects of the program that facilitate MHP participation?
  - c. Of those MHP owners that have declined to participate in the program, why did they elect this option?
6. *Consideration of RV spots for eligibility in program*
- a. How many MHPs could not be converted because RV spots could not be converted?
    - i. How many RV spots exist in the existing MHPs left to be converted?
  - b. What is the demand for converting RV spaces in this program?
  - c. What is the approximate cost the MHP owner must bear for covering RV space conversion?
7. *IOU Cost Recovery*
- a. How much has been spent on this program?
    - i. Cumulatively?
    - ii. Annually?
    - iii. Per IOU?
  - b. What is the present value of the revenue requirement for each IOU as a result directly related to this program?
    - i. Per IOU?

- ii. Per BTM and TTM space, electric and gas?
  - c. What percentage of costs for this program fall on electric versus gas ratepayers?
  - d. What has the impact on ratepayers been (CARE and non-CARE) because of this program?
8. ***Prioritization criteria:***
- a. Do the utilities find the current Risk Model and Prioritization Lists adequate and accurate?
  - b. Are there risk factors that should be removed from the current risk model?
  - c. Are there risk factors not accounted for by the model that are currently missing?
  - d. How does the risk model currently account for disadvantaged community status?
9. ***Other program alterations?***
- a. How are vacant eligible spaces currently treated in the program?
    - i. How many vacant spaces have been treated?
    - ii. How many vacant spaces were later occupied by tenants?
    - iii. How many vacant spaces remain vacant after conversion?
    - iv. What are the utility approaches to spaces that remain vacant?
  - b. What issues has the program experienced with existing solar PV systems in master-metered MHPs?
  - c. How many park model homes exist in MHPs?
    - i. How are IOUs treating them now in the current program?

- ii. What challenges do these homes present to the current program?
- d. How much funding would be necessary to further improve and scale the program outcomes?
  - i. Quantify the funding amount with specific program improvements, taking into consideration necessary infrastructure improvements.
  - ii. What sources of funding would be reasonable from external sources (e.g., federal, state, municipal) and ratepayers?
  - iii. How will this translate to bill savings?

### **5.1. Party Comments**

Six parties filed comments: the California Association of Small and Multijurisdictional Utilities (CASMU), which represents BVES, Liberty, and PacifiCorp; PG&E; SDG&E; SCE; SoCal Gas; and SWG.

In their comments parties all expressed concern that they will not be able to answer, in detail, all the questions posed in the ALJ ruling. Instead CASMU, SDG&E, SoCalGas and SWG all suggested that HCD, the SED, and MHP owners may be better positioned to respond to the evaluation questions.<sup>33</sup>

Parties also provided specific suggested changes for some evaluation questions, proposed additional questions that were not included in the ALJ

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<sup>33</sup> Joint Comments of Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp (collectively, the California Association of Small and Multi-Jurisdictional Utilities (CASMU) on the Administrative Law Judge's Ruling, September 24, 2024, at 4; San Diego Gas & Electric Company's Comments on the MHP Pilot Program Evaluation Criteria and Related Questions as Proposed by Commission Staff (SDG&E), September 24, 2024, at 1; and Comments of Southwest Gas Corporation on the Proposed Mobile Home Park Program Evaluation Criteria (SWG), September 24, 2024 at 2.



ruling and suggested eliminating some questions deemed irrelevant to the 2025 mid-program evaluation for program years 2021 to 2024.

PG&E's comments responding to the ALJ ruling fell into five broad categories, as follows:

1. Clarifications that PG&E does not track the data being requested: 2.e<sup>34</sup>, 5.c<sup>35</sup>, 6.a<sup>36</sup>, 6.a.i<sup>37</sup>, 9.c<sup>38</sup>;
2. Recommendation that the question be eliminated as a criterion: 6.b<sup>39</sup>, 6.c<sup>40</sup>;
3. Recommendation that the question should be answered by the Commission or some other agency or party: 1.a<sup>41</sup>, 8.a<sup>42</sup>, 8.b<sup>43</sup>, 8.c<sup>44</sup>, 8.d<sup>45</sup>, 9.d.ii<sup>46</sup>;

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<sup>34</sup> Opening Comments of Pacific Gas and Electric Company to the Administrative Law Judge's Ruling (PG&E Opening Comments), September 24, 2024, at 3.

<sup>35</sup> *Id.* at 4.

<sup>36</sup> *Ibid.*

<sup>37</sup> *Ibid.*

<sup>38</sup> PG&E Opening Comments, at 7.

<sup>39</sup> *Id.* at 4 and 5.

<sup>40</sup> *Ibid.*

<sup>41</sup> *Id.* at 1 and 2.

<sup>42</sup> *Id.* at 6.

<sup>43</sup> *Ibid.*

<sup>44</sup> *Ibid.*

<sup>45</sup> *Ibid.*

<sup>46</sup> PG&E Opening Comments, at 8.

4. Support that the question is beneficial for the evaluation without alteration: 2.a<sup>47</sup>, 2.d<sup>48</sup>, 3.a<sup>49</sup>, 3.b<sup>50</sup>, 3.c<sup>51</sup>, 4.a<sup>52</sup>, 4.b<sup>53</sup>, 5.a<sup>54</sup>, 5.b<sup>55</sup>, 7.c<sup>56</sup>, 7.d<sup>57</sup>, 9.a.i;ii;iii;iv<sup>58</sup>, 9.b<sup>59</sup>, 9.c.i;ii<sup>60</sup>; and,
5. Comment(s) and recommended refinements or alternate text for the ruling question:
  - a. Question 1. b, should be revised to read, “ At the current rate, what percentage of MHP applicants in each IOU service territory will be converted by 2030?”<sup>61</sup>
  - b. Question 2.c, should be revised to read, “What are the per-space (TTM and BTM) per service costs for electric and gas spaces?”<sup>62</sup>
  - c. Question 7.a, 7.a.i;ii;iii, should be revised to read, “What are the recorded capital O&M costs for this program?”<sup>63</sup>

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<sup>47</sup> *Id.* at 2.

<sup>48</sup> *Ibid.*

<sup>49</sup> PG&E Opening Comments, at 3.

<sup>50</sup> *Ibid.*

<sup>51</sup> *Ibid.*

<sup>52</sup> *Ibid.*

<sup>53</sup> *Ibid.*

<sup>54</sup> PG&E Opening Comments, at 4.

<sup>55</sup> *Ibid.*

<sup>56</sup> PG&E Opening Comments, at 6.

<sup>57</sup> *Ibid.*

<sup>58</sup> PG&E Opening Comments, at 7.

<sup>59</sup> *Ibid.*

<sup>60</sup> PG&E Opening Comments, at 7 and 8.

<sup>61</sup> *Id.* at 2.

<sup>62</sup> *Ibid.*

<sup>63</sup> PG&E Opening Comments, at 5.

- d. Question 7.b, 7.b.i;ii, PG&E's should be revised to read, "What is the annual revenue requirement for each IOU as a result directly related to this program?"<sup>64</sup>

SCE's comments responding to the ALJ ruling also focused on five broad categories, as follows:

1. Clarification the SCE does not track the data being requested: 1.a<sup>65</sup>, 6.a<sup>66</sup> ;
2. Recommendation that the question be eliminated as a criterion: 4.e<sup>67</sup>, 4.d<sup>68</sup>, 6.a<sup>69</sup>, 6.a.1<sup>70</sup>, 6.b<sup>71</sup>, 6.c<sup>72</sup>, 7.c<sup>73</sup>, 8.b<sup>74</sup>, 8.c<sup>75</sup>, 9.a.1<sup>76</sup>, 9.a.2<sup>77</sup>, 9.a.3<sup>78</sup>, 9.a.4<sup>79</sup>, 9.c<sup>80</sup>, 9.d.3<sup>81</sup>;

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<sup>64</sup> *Id.* at 5 and 6.

<sup>65</sup> Southern California Edison Company Comments on the Mobile Home Park Pilot Program Evaluation Criteria (SCE Comments), September 24, 2024, at 2.

<sup>66</sup> *Id.* at 6.

<sup>67</sup> *Id.* at 4.

<sup>68</sup> *Id.* at 5.

<sup>69</sup> *Id.* at 6.

<sup>70</sup> *Ibid.*

<sup>71</sup> *Ibid.*

<sup>72</sup> *Ibid.*

<sup>73</sup> SCE Comments, at 8.

<sup>74</sup> *Id.* at 9.

<sup>75</sup> *Ibid.*

<sup>76</sup> SCE Comments, at 10.

<sup>77</sup> *Ibid.*

<sup>78</sup> *Ibid.*

<sup>79</sup> *Ibid.*

<sup>80</sup> SCE Comments, at 11.

<sup>81</sup> *Id.* at 12.

3. Recommendation that the question should be answered by the Commission or some other agency or party: 1.a<sup>82</sup>, 8.a<sup>83</sup>, 8.d<sup>84</sup>, 9.c<sup>85</sup>, 9.c.2<sup>86</sup>;
4. Support that the question is beneficial for the evaluation without alteration: 2.a<sup>87</sup>, 2.d<sup>88</sup>, 2.e<sup>89</sup>, 3.a<sup>90</sup>, 3.b<sup>91</sup>, 3.c<sup>92</sup>, 4.a<sup>93</sup>, 5.a<sup>94</sup>, 5.b<sup>95</sup>, 7.b.1<sup>96</sup>, 9.a<sup>97</sup>, 9.b<sup>98</sup>, 9.c.1<sup>99</sup>.
5. Comment(s), refinements or alternate text for the ruling question:
  - a. Question 1.b, SCE's should be modified to add 'is the approximate' percentage of MHP applicants that will be converted by 2030. SCE claimed that this additional is due to the difficulty of accurately forecasting progress each year. The revised question would read "At the current rate, what is the approximate percentage of MHP applicants will be converted by 2030?"<sup>100</sup>

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<sup>82</sup> *Id.* at 2.

<sup>83</sup> *Id.* at 9.

<sup>84</sup> *Id.* at 10.

<sup>85</sup> *Id.* at 11.

<sup>86</sup> *Ibid.*

<sup>87</sup> SCE Comments, at 3.

<sup>88</sup> *Ibid.*

<sup>89</sup> *Ibid.*

<sup>90</sup> SCE Comments, at 4.

<sup>91</sup> *Ibid.*

<sup>92</sup> *Ibid.*

<sup>93</sup> *Ibid.*

<sup>94</sup> SCE Comments, at 5.

<sup>95</sup> *Ibid.*

<sup>96</sup> SCE Comments, at 8.

<sup>97</sup> *Id.* at 10.

<sup>98</sup> *Id.* at 11.

<sup>99</sup> *Ibid.*

<sup>100</sup> SCE Comments, at 2.

- b. Question 2.b should be modified to, "Have the utilities met, exceeded, or not met their annual conversion cost targets? Why or why not? SCE states that the additional language provides clarification for the responder."<sup>101</sup>
- c. Question 2.c should be modified to, "What are the average per-space (TTM and BTM) costs for electric and gas spaces? SCE state that adding the word "average" will allow the responder to consider the range of cost that occur with different MHP conversion."<sup>102</sup>
- d. Question 5.c should be modified to, "Of those MHP owners that have declined to participate in the program, what are some of the reasons why they elected this option?"<sup>103</sup>
- e. Question 7.a should be modified to, "Provide the recorded capital and O&M for this program?" In addition to looking at the cumulative, annual and per IOU data for capital and O&M, SCE's comments indicated that the evaluation should also look at average cost per space."<sup>104</sup>
- f. Question 7.b should be modified to, "What is the present value of the annual revenue requirement for each IOU as a result directly related to this program?"<sup>105</sup>
- g. Question 7.b.2, should be modified to, "Per BTM and TTM space, average electric and gas."<sup>106</sup>

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<sup>101</sup> *Id.* at 3.

<sup>102</sup> *Ibid.*

<sup>103</sup> SCE Comments at 5.

<sup>104</sup> *Id.* at 7.

<sup>105</sup> *Id.* at 8.

<sup>106</sup> *Ibid.*

- h. Question 7.d should be modified to, “Provide the recorded rate and bill impacts to ratepayers (CARE and non-CARE) consistent with the annual revenue requirements provided in 7(b).?”<sup>107</sup>
- i. Question 9.d.2, SCE comments that this question is valuable but suggested a qualifier as follows, “What sources of funding would be reasonable from external sources (e.g. federal, state, municipal) and ratepayer to offset program cost?”<sup>108</sup>

SCE’s comments added an additional question that was not included in the ALJ’s ruling as follows: “What strategies or actions can be implemented to enhance the efficiency and effectiveness of our current program operations?”<sup>109</sup>

Like PG&E and SCE, SoCalGas’ comments addressed each question included in the ALJ ruling. Here are comments that the Commission relied on to make modifications to the questions in the ALJ ruling:

**Question 2: Progress, Conversion Targets, and Conversion Costs:**

*Question 2.c* should clarify whether per-space costs should be reported the same way they are in the annual report, i.e., an average inclusive of operations and maintenance (O&M) and administrative costs.

*Question 2.d* should be modified to ask about the total number of spaces converted rather than the total number of parks converted. SoCalGas also argued that MHPs have varying numbers of spaces, and thus focusing on spaces rather than parks provides a more accurate reflection of the progress made in a particular territory.<sup>110</sup>

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<sup>107</sup> SCE Comments, at 9.

<sup>108</sup> *Id.* at 12.

<sup>109</sup> *Ibid.*

<sup>110</sup> *Id.* at 2

**Question 4: Resident Access to Utility Programs:**

*Question 4.a* should be modified as follows: “How have enrollments in CARE and Medical Baseline changed for newly converted residents?”<sup>111</sup>

*Question 4.b* should be modified as follows: “How have enrollments in energy management and conservation programs changed for newly converted residents?” adding a related question, “What is the environmental benefit realized by the MHP through these programs?”<sup>112</sup>

*Question 4.c*, should be clarified to ask about other benefits such as partnerships with other service providers (e.g. water companies) etc.<sup>113</sup>

**Question 6: Consideration of RV spots for eligibility in Program:**

*Question 6.a* should recommend that the Commission conduct surveys of parks that declined to participate in the MHP Program to better understand why they chose not to participate.<sup>114</sup>

*Question 6.c* should be modified to add specific criteria for assumption and inclusions to ensure consistency, adding that the cost-per-space can serve as an indicator of overall conversion costs.<sup>115</sup>

SoCalGas’s comments also introduced two additional questions for the evaluation that were not included in the ALJ ruling as follows:<sup>116</sup>

1. What are potential program modifications or enhancements that can provide: a. Cost Savings? b. Increased Owner Interest?

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<sup>111</sup> *Ibid.*

<sup>112</sup> *Ibid.*

<sup>113</sup> Comments of Southern California Gas Company on Administrative Law Judge Ruling Requesting Comment on Staff Proposed Mobilehome Park Pilot Program Evaluation Criteria, September 24, 2024 (Comment of SoCalGas), at 4.

<sup>114</sup> *Ibid.*

<sup>115</sup> *Ibid.*

<sup>116</sup> Comments of SoCalGas, at 2.

2. What areas of the BTM process could be modified to: a. Reduce Cost? b. Enhance efficiency?

Instead of addressing each question in the ALJ ruling, SDG&E's comments made some general observations about the ruling and posed some clarifying comments to selected questions. SDG&E's comments suggested that the Commission should permit parties to present additional questions that allow stakeholders to offer further perspectives, fully addressing the program's benefits, opportunities, and challenges.<sup>117</sup>

## **5.2. Discussion**

The Commission agrees with party comments that not all the questions posed in the September 10, 2024 ruling can be answered by the utilities participating in the MHP UCP. Commission staff will rely on other sources, such as HCD, SED, and MHP owners and residents to conduct the evaluation. To the extent applicable and appropriate, Commission staff will use existing sources, such as the MHP annual reports to avoid duplicative reporting and administrative burden from utilities. Especially utilities like BVES and Liberty with smaller customer bases and staff compared to the larger IOUs.

After reviewing the proposed ALJ evaluation questions and party comments including alternate text, the Commission has made changes to several proposed evaluation questions. The chart below lists each original question from the ALJ ruling, adds an additional question and indicates whether the Commission eliminated, modified or retained the question unchanged from the ALJ ruling version. The changed text is italicized.

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<sup>117</sup> *Ibid.*



No.	ALJ Ruling Question	Final Revised Question
1.a	How many parks have applied to this program of the known/existing gas master-metered MHPs?	How many parks have applied to this program of the known/existing gas <i>and electric</i> master-metered MHPs?
1.b	At the current rate, what percentage of MHP applicants will be converted by 2030?	At the current rate, what is <i>the approximate</i> percentage of MHP applicants <i>in each IOU service territory</i> that will be converted by 2030?
2.a	Have utilities met their annual and total conversion targets thus far? Why or why not?	<b>No change</b>
2.b	Have utilities met their annual conversion cost targets? Why or why not?	Have utilities met, <i>exceeded, or not met</i> their annual conversion cost targets? Why or why not?
2.c	What are the per-space (TTM and BTM) costs for electric and gas spaces?	What are the <i>average</i> per-space (TTM and BTM) <i>per service</i> costs for electric and gas spaces? <i>These costs should be reported in the same way as the annual report and should include average operations, maintenance, and administrative costs.</i>
2.d	How much progress has been made (% of total parks) to date regarding total parks converted?	How much progress has been made (% of total <i>spaces</i> ) to date regarding total parks converted?

No.	ALJ Ruling Question	Final Revised Question
2.e	How many parks chose not to participate in the program (those who submitted applications declining to participate)?	<b>No change</b>
3.a	What safety improvements has the program achieved? Are there gaps in safety that still need to be addressed through this program?	What safety improvements ( <i>such as in the gas and electrical infrastructure</i> ) <i>have been achieved for MHP residents?</i> Are there gaps in safety that still need to be addressed through this program?
3.b	How many parks have experienced an increase in electric capacity?	<b>No change</b>
3.c	How has reliability of service changed as a result of this program?	<b>No change</b>
4.a	How has access to CARE and Medical Baseline services changed?	How <i>have enrollments in CARE, Medical Baseline and other assistance programs changed for newly converted residents? If applicable, what is the amount of the benefit received through the MHP program under these programs?</i>

No.	ALJ Ruling Question	Final Revised Question
4.b	How has access to energy management and conservation programs changed?	How <i>have enrollments in</i> energy management and conservation programs changed <i>for newly converted residents? If available, please quantify the environmental benefit realized through these programs.</i>
4.c	Have there been other benefits realized by participants as a result of the program?	<b>No change</b>
4.d	Are there ways to make these services/programs more accessible to newly converted residents?	<b>No change</b>
5.a	What challenges do MHP owners face in participating in this program?	<b>No change</b>
5.b	What are positive aspects of the program that facilitate MHP participation?	<b>No change</b>
5.c	Of those MHP owners that have declined to participate in the program, why did they elect this option?	Of those MHP owners <i>who</i> have declined to participate in the program, <i>what are some of the reasons</i> why they elected this option?

No.	ALJ Ruling Question	Final Revised Question
6.a	How many MHPs could not be converted because RV spots could not be converted?	<i>How has the MHP program's policy on not converting RV spaces influenced MHP owner's decision to participate in the program?</i>
6.a.i	How many RV spots exist in the existing MHPs left to be converted?	<b>No change</b>
6.b	What is the demand for converting RV spaces in this program?	<b>Eliminated</b>
6.c	What is the approximate cost the MHP owner must bear for covering RV space conversion?	<i>What are possible per-space costs that an MHP owner would bear for covering RV space conversion?</i>
7.a	How much has been spent on this program?	<i>What are the recorded capital, operations and maintenance costs for this program?</i>
7.a.i	Cumulatively?	Cumulatively?
7.a.ii	Annually?	Annually?
7.a.iii	Per IOU?	Per IOU?
7.a.iv		<i>Average cost per space?</i>
7.b	What is the present value of the revenue requirement for each IOU as a result directly related to this program?	<i>What is the annual revenue requirement for each IOU as a result of this program?</i>
7.b.i	Per IOU?	Per IOU?

No.	ALJ Ruling Question	Final Revised Question
7.b.ii	Per BTM and TTM space, electric and gas?	Per BTM and TTM space, electric and gas?
7.c	What percentage of costs for this program fall on electric versus gas ratepayers?	<b>No change</b>
7.d	What has been the impact on ratepayers (CARE and non-CARE) because of this program?	What are the recorded rate and bill impacts to ratepayers (CARE and non-CARE)? This should be consistent with the annual revenue requirement information provided in 7(b) above.
8.a	Do the utilities find the current Risk Model and Prioritization Lists adequate and accurate?	<i>Are</i> the current Risk Model and Prioritization lists adequate and accurate?
8.b	Are there risk factors that should be removed from the current risk model?	Are there risk factors that should be removed from the current risk model? Why or Why not?
8.c	Are there risk factors not accounted for by the model that are currently missing?	<b>Eliminated</b>
8.d	How does the risk model currently account for disadvantaged community status?	<b>No change</b>

No.	ALJ Ruling Question	Final Revised Question
9.a	How are vacant eligible spaces currently treated in the program?	<b>No change</b>
9.a.i	How many vacant spaces have been treated?	<i>If data is available, how many vacant spaces have been treated?</i>
9.a.ii	How many vacant spaces were later occupied by tenants?	<i>If data is available, how many vacant spaces were later occupied by tenants?</i>
9.a.iii	How many vacant spaces remain vacant after conversion?	<i>If data is available, how many treated vacant spaces remain vacant after conversion?</i>
9.a.iv	What are the utility approaches to spaces that remain vacant?	<b>Eliminated</b>
9.b	What issues has the program experienced with existing solar PV systems in master-metered MHPs?	<b>No change</b>
9.c	How many park model homes exist in MHPs?	<b>No change</b>
9.c.i	How are IOUs treating them now in the current program?	<b>No change</b>
9.c.ii	What challenges do these homes present to the current program?	<b>No change</b>

No.	ALJ Ruling Question	Final Revised Question
9.d	How much funding would be necessary to further improve and scale the program outcomes?	<b>No change</b>
9.d.i	Quantify the funding amount with specific program improvements, taking into consideration necessary infrastructure improvements.	<b>No change</b>
9.d.ii	What sources of funding would be reasonable from external sources (e.g., federal, state, municipal) and ratepayers?	What <i>levels and sources</i> of funding would be reasonable from external sources (e.g., federal, state, municipal) and ratepayers <i>to offset program cost</i> ?
9.d.iii	How will this translate to bill savings?	How will this translate to bill savings <i>for MHP residents and/or ratepayers as a whole</i> ?
10		<i>What strategies or actions can be implemented to enhance the efficiency and effectiveness of our current program operations, provide cost savings, and/or increase MHP owner interest?</i>

PG&E's and SCE's comments to questions number 1.a and 2.a to 2.e were persuasive and contributed to the updated text the Commission selected for these questions. For question 3.a, the Commission chose to rephrase this question more broadly to capture as much information as possible about potential safety improvements. MHP owner surveys will be used to address question 3.c, some parties (CASMU, SDG&E and SoCalGas) argued that they have no data on prior outages, however, it is important to understand whether reliability is other service areas are impacted by the UCP. For questions 4.a and 4.b, SoCalGas' comments offered reasonable cause to reconsider and expand this question. PG&E's comments characterized question 4.c and 4.d as overly broad<sup>118</sup>, while SoCalGas' comments suggested that this question should be clarified to ask about other benefits such as partnerships with other service providers (e.g. water companies).<sup>119</sup> The Commission wants to better understand the broad range of benefits of the MHP from multiple perspectives and retained these questions. The Commission acknowledges that question 5 should be answered by MHP owners and/or residents and expanded 5.c in response to suggested changes in SCE's comments.<sup>120</sup> Regarding question 6, the Commission is aware that the IOUs do not track or have information about RVs, however, better understanding information about RV's is important to assess their cost impacts on MHP owners. For question 7, PG&E's and SCE's comments regarding using

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<sup>118</sup> Opening Comments of Pacific Gas and Electric Company to the Administrative Law Judge's Ruling (PG&E Opening Comments), September 24, 2024, at 3 and 4.

<sup>119</sup> Comments of Southern California Gas Company on Administrative Law Judge Ruling Requesting Comment on Staff Proposed Mobilehome Park Pilot Program Evaluation Criteria, September 24, 2024 (Comments of SoCalGas), at 4.

<sup>120</sup> Southern California Edison Company Comments on the Mobile Home Park Pilot Program Evaluation Criteria (SCE Comments), September 24, 2024, at 5.



recorded values from the annual reports is reasonable, the Commission also adopted SCE's suggested addition of "average cost per space" to this question. The Commission acknowledges that question 8 should be answered by SED and eliminated question 8.c as recommended in SCE's comments.<sup>121</sup> For question 9, we have eliminated 9.a.iv as recommended in SCE's comments.<sup>122</sup> The remaining portions of question 9 are retained to assist the Commission in gathering data to eliminate inefficiencies and support updating future program policies. The Commission signals its agreement with comments by both SCE<sup>123</sup> and SoCalGas<sup>124</sup> that the evaluation should look at ways to improve efficiency and effectiveness and adds question 10 to the list of criteria for the mid-program evaluation.

## **6. Summary of Public Comments**

There were no public comments on the docket card for this proceeding.

## **7. Conclusion**

Upon review of R.18-04-014 Phase 2B Staff Proposal, dated July 25, 2023, and Parties' comments, the Commission adopts a 200-amp electrical service standard for TTM and BTM connections for MHPs that participate in the existing MHP UCP. In addition, the Commission establishes and adopts baseline criteria for conducting a mid-program evaluation of the existing MHP UCP. The Commission will consider a MHP electrification pilot in a future decision while it explores and establishes funding sources. This proceeding remains open.

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<sup>121</sup> *Id.* at 9.

<sup>122</sup> *Id.* at 10.

<sup>123</sup> *Id.* at 12.

<sup>124</sup> Comments of Southern California Gas Company on Administrative Law Judge Ruling Requesting Comment on Staff Proposed Mobilehome Park Pilot Program Evaluation Criteria, September 24, 2024 (Comments of SoCalGas), at 2.

**8. Procedural Matters**

All rulings issued in this proceeding to date are affirmed. All pending motions not affirmatively ruled on in this proceeding are denied.

**9. Comments on Proposed Decision**

The proposed decision of Commissioner Karen Douglas in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. No party comments to the proposed decision were filed in this proceeding.

**10. Assignment of Proceeding**

Karen Douglas is the assigned Commissioner and Hazlyn Fortune is the assigned Administrative Law Judge in this proceeding.

**Findings of Fact**

1. D.20-04-004 established a 10-year MHP Utility Conversion Program to run from 2021 through 2030.
2. The Commission, at COL 16 and OP 16, in D.20-04-004 found it reasonable to evaluate the MHP Utility Conversion Program in 2025 following the first four-year application cycle (2021-2024) to decide whether to continue or modify the program.
3. Record of this proceeding supports adoption of a 200-amp electric service standard for the MHP Utility Conversion Program.
4. Record of this proceeding supports adoption of the mid-program evaluation criteria attached to this decision as Appendix A, which the Commission staff will use to review the Mobilehome Park UCP.
5. The Commission requires more time to establish funding sources to explore the development of a MHP electrification pilot.

6. The Commission will consider establishing and Mobilehome Park electrification pilot in a future decision.

**Conclusions of Law**

1. It is reasonable for the Commission to adopt a 200-amp electric service standard for the MHP UCP.

2. The Commission should adopt the mid-program evaluation criteria for the MHP UCP, attached to this decision as Appendix A, which the Commission staff should use to review the Mobilehome Park UCP.

3. The Mobilehome Park Utility Conversion Program agreement, as established in D.20-04-004 Ordering Paragraph 6 and Appendix C, should be revised.

4. This proceeding should remain open.

**O R D E R**

**IT IS ORDERED** that:

1. A 200-amp standard for “to-the-meter” TTM and “behind-the-meter” BTM components of the Mobilehome Park Utility Conversion Program is adopted.

2. The mid-program evaluation criteria for the Mobilehome Park Utility Conversion Program, attached to this decision as Appendix A, is adopted and will be used by the Commission staff to review the Mobilehome Park Utility Conversion Program.

3. Pacific Gas and Electric Company, Southern California Gas Company, Southern California Edison Company, Southwest Gas Corporation, San Diego Gas and Electric Company, Pacific Power, Bear Valley Electric Service Company, and Liberty Electric Company, nine months from the effective date of this decision, shall comply with a 200-amp standard for “to-the-meter” TTM and

“behind-the-meter” BTM components of the Mobilehome Park Utility Conversion Program.

4. Within nine months from the issuance date of this decision, Pacific Gas and Electric Company, Southern California Gas Company, Southern California Edison Company, Southwest Gas Corporation, San Diego Gas and Electric Company, Pacific Power, Bear Valley Electric Service Company, and Liberty Electric Company shall revise the Mobilehome Park Utility Conversion Program agreement, as established in Decision 20-04-004 Ordering Paragraph 6 and Appendix C, and work with Energy Division and Safety and Enforcement Division staff to ensure that the language in the agreement fulfills the requirements of this decision.

5. Pacific Gas and Electric Company, Southern California Gas Company, Southern California Edison Company, Southwest Gas Corporation, San Diego Gas and Electric Company, Pacific Power, Bear Valley Electric Service Company, and Liberty Electric Company shall use the cost recovery method adopted for the Mobilehome Park Pilot program in Decision (D.) 14-03-021 and referenced in D.20-04-004 in Section 14.3 to address additional costs to implement the 200-amp standard.

6. Pacific Gas and Electric Company, Southern California Gas Company, Southern California Edison Company, Southwest Gas Corporation, San Diego Gas and Electric Company, Pacific Power, Bear Valley Electric Service Company, and Liberty Electric Company shall at the conclusion of the Mobilehome Park Utility Conversion Program in 2030, develop a report in consultation with Energy Division Staff to assess the appropriateness of the 200-amp standard and any technological developments that may warrant a change to

the electric service standard offered in any future iteration of the Mobilehome Park Utility Conversion Program.

7. Rulemaking 18-04-018 remains open.

This order is effective today.

Dated December 19, 2024, at San Francisco, California

ALICE REYNOLDS

President

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

Commissioners

Commissioner Matthew Baker recused himself from this agenda item and was not part of the quorum in its consideration.