

SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION FOR APPROVAL TO EXTEND THE MOBILE HOME PARK UTILITY
UPGRADE PROGRAM

(A.17-05-007)

(DATA REQUEST ORA-SCG-002-CY3)

QUESTION 1:

With regard to the “environmental issues” discussed from line 4 on p. DM-4 of Chapter 2, please explain:

- a. The extent to which SoCalGas has encountered such environmental or cultural issues that required remediation during its experience to date with the MHP upgrade pilot;
- b. The extent to which any waitlisted MHPs have indicated the known presence of such issues on their property.

RESPONSE 1:

- a) Pursuant to D.14-03-021, SoCalGas conducted desktop environmental and cultural resources reviews for each of the Category 1 designated mobilehome parks (MHPs). To date, two mobile home parks have required cultural and environmental mitigation efforts.
- b) SoCalGas has not conducted desktop environmental and cultural resource reviews for any mobilehome park not identified or participating within the pilot program. Therefore, SoCalGas is not aware of any waitlisted MHP with either environmental or cultural resource issues on their property.

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QUESTION 2:

With regard to the TTM RFI and RFP described in lines 18 to 19 on p. DM-5, please provide cost estimates or bids from those contractors that were selected and those contractors that were not selected as a result of this process.

RESPONSE 2:

Updated Response 07/17/2017

Of the twenty-one contractors who participated in the RFI, ten contractors were invited to participate in the RFP. An additional five contractors were added to the RFP as they were SCE signatories but inadvertently left off of the RFI invite. Of the fifteen contractors invited to participate in the RFP, six contractors either declined to bid or simply did not submit proposals.

The attached Excel file (Q2) lays out the TTM and BTM cost estimates provided by the remaining nine contractors. **Please note that the yellow highlighted information on the attachment is confidential and protected material pursuant to PUC Section 583, GO-66C and D.16-08-024.** These estimates were compiled internally using a standardized units-based approach. The units were not a full depiction of the scope of work for a complete MHP upgrade project as the Pilot was in its early stages at the time and the program team was still working to define and develop the scope of work.

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QUESTION 3:

With regard to the BTM RFI described in line 6 on p. DM-6, please explain:

- a. Was this a separate process from the TTM RFI process?
- b. Are the contractors on the list that resulted from the BTM RFI process the same or different from those that participated in the TTM RFI process?

RESPONSE 3:

- a) No. The process for the BTM RFI was not separate from the TTM RFI process. Contractors participating in the TTM RFI were also asked to provide information for the BTM work.
- b) Most are different; however, one TTM contractor remains on the BTM list to date.

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QUESTION 4:

With regard to the legacy system discontinuance period, as discussed from line 14-21 on p. DM-6, please explain:

- a. To what extent have MHP owners failed to comply with the 90-day window, in SoCalGas experience to date with the MHP upgrade program?
- b. What reason(s) have MHP owners provided to SoCalGas in the event that they were not able to comply with the 90-day window?

RESPONSE 4:

- a) At this time SoCalGas does not have data indicating the exact number of times MHP owners have failed to comply with the 90-day window, but in SoCalGas' experience to date, SoCalGas has found the occurrence to be infrequent.
- b) Misunderstanding of responsibilities and communication issues are the typical reasons MHP owners have provided when they were not able to comply with the 90-day window.

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QUESTION 5:

With regard to the application of residents for direct utility service, as discussed in line 15 to 16 of p. DM-7, please explain:

- a. What is the optimal timing for residents to apply for direct utility service?
- b. How does the outreach plan introduce residents to the process for applying for direct utility service?
- c. In SoCalGas' experience to date with the MHP upgrade program, what percentage of residents did not apply for direct utility service before the final space was prepared for cutover? How long after the final space was prepared did it take these residents to apply?

RESPONSE 5:

- a) Within 30 days prior to TTM completion. As described in the SoCalGas Outreach Communication plan, SoCalGas provides communication to residents to initiate the service application process 30 days prior to TTM completion
- b) SoCalGas' outreach plan has numerous service application process contact points for residents. At the pre-construction resident forum, SoCalGas introduces the service application process including the optimal application time, additional services (CARE, Medical Baseline, On-line account management, etc.). Once construction is about 30 days from TTM completion, SoCalGas provides written notification (door hangers) and personal contact (either in-person or phone). After 10 days, a second notification is provided with notice to park management of those who have yet to submit an application. Upon TTM completion through gas meter installation, SoCalGas makes a final attempt to work with customers and park management for any pending service applications.
- c) Experience has shown that nearly every mobile home park has some residents (under 5%) who decline to apply for direct service prior to a desired cutover date. SoCalGas avoids discontinuance of gas service to all residents and makes numerous and varied (phone, in person, in writing, door hangers) outreach efforts to avoid cessation of gas service. After MHP owner master meter removal approval and actual removal, those residents who have failed to apply for direct gas service usually contact SoCalGas within days.

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QUESTION 6:

With regard to the prioritization process, as discussed from line 18-21 on p. DM-8, please explain:

- a. Please explain the nature and extent of the “lessons learned” mentioned in line 7;
- b. Please explain how the prioritization of MHPs would change under SoCalGas’ proposal. If it will not change, please provide a justification for the recommendation of a re-prioritization process with respect to specific prioritization criteria.

RESPONSE 6:

- a) SoCalGas has proposed that SED conduct a new Form of Intent (FOI) process based on SED’s lessons learned as the overseer of this statewide pilot program. SoCalGas does not have input on how program participants are selected. Based upon MHP owner communication, SoCalGas surmises that MHP owners who may not have applied or chose not to participate having been in contact with those that have participated and now would welcome an opportunity to be selected or submit a form of intent based upon the program’s success.
- b) Under the pilot program, the utilities did not provide input or recommendations to SED regarding the prioritization criteria and how participants were selected, nor is SoCalGas suggesting that the utilities do so now; the re-prioritization would be to reassess those new submittals within the existing park prioritization. For example, a mobilehome park that met the Category 1 pilot selection criteria but did not submit a form of intent in 2015 should be prioritized ahead of those who did submit initially but were categorized as a Category 2 or 3. This would ensure that the program continues to address those parks that pose the greatest concern.

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QUESTION 7:

With regard to the treatment of permanent buildings, as discussed from line 12-21 on p. DM-9, please explain:

- a. In each MHP, how many permanent buildings that are residential homes served by the master meter has SoCalGas encountered in its experience to date with the MHP upgrade program?
- b. How many MHPs have such a permanent building?
- c. What is the number of such permanent buildings in each MHP that was found to have at least one such permanent building?

RESPONSE 7:

- a) SoCalGas has not tracked/recorded the number of permanent buildings within mobilehome parks.
- b) SoCalGas has not tracked/recorded the number of permanent buildings within mobilehome parks.
- c) SoCalGas has not tracked/recorded the number of permanent buildings within mobilehome parks.

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QUESTION 8:

With regard to the treatment of RV spaces, as discussed from line 3-21 on p. DM-10, please explain:

- a. In SoCalGas' experience to date with the MHP upgrade program, how many interspersed RV spaces have been encountered? How many interspersed RV spaces have been upgraded? Please provide a breakdown of these numbers for each MHP that SoCalGas has completed to date.
- b. How many MHPs have such an interspersed RV space?
- c. What is the number of such interspersed RV spaces in each MHP that was found to have at least one such interspersed RV space?
- d. What percentage of the RV spaces that SoCalGas has encountered in its experience to date with the MHP upgrade program belong to permanent, year-round residents?
- e. For what percentage of a given year is the average RV space occupied by its resident?

RESPONSE 8:

- a) To date, SoCalGas has encountered 12 MHPs with a total of 149 interspersed RV designated spaces per HCD Permit to Operate (PTO). SoCalGas has not provided pilot program funded gas service to a HCD PTO designated RV space.

MHP	FOI	MH	RV
1	68	67	13
2	40	13	27
3	63	63	22
4	83	65	18
5	51	51	15
6	107	107	13
7	35	39	10
8	67	61	10
9	71	65	6
10	180	180	5
11	45	45	5
12	25	32	5
			149

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- b) SoCalGas has encountered 12 mobile home parks where the RV spaces are either interspersed or the mobilehome park owner does not recall which spaces are designated as RV versus mobilehome spaces.
- c) See Table from Response 8a.
- d) SoCalGas has not tracked/recorded the number of permanent year-round residents residing within RV designated spaces.
- e) SoCalGas has not tracked/recorded the number of permanent year-round residents residing within RV designated spaces.