

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

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**QUESTION 1:**

With regard to lines 10 to 14 on p. JSV-5:

- a. Please describe and explain SoCalGas' strategy for coordination with other utilities as part of the MHP program.
- b. Please describe the methodology SoCalGas uses to allocate costs with any utility with which SoCalGas coordinates in the MHP program.
- c. Please provide a list of waitlisted MHPs whose conversion may involve coordination with other utilities. Please identify which utility(-ies) would be involved, the number of MHPs associated with each utility, and the number of spaces associated with each MHP.

**RESPONSE 1:**

- a. In the case of energy infrastructure, Southern California Gas Company (SoCalGas) has coordinated with three electric Investor Owned Utilities (IOUs): Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E). SoCalGas also reached out to the serving electric municipal and publicly owned utilities about mobilehome parks (MHPs) located in their service territory and their interest to participate in a joint electric and gas MHP conversion project. To date, no municipal or publicly owned utility has elected to participate in a joint trench conversion project. In the case of joint trench projects, MHP personnel from both SoCalGas and the electric IOU work together to coordinate outreach, planning, design and construction. In these cases, the electric IOU and SoCalGas use a single civil contractor to perform the electric and gas civil work and use joint trenching where feasible. After the civil construction work is complete, SoCalGas performs the gas-specific work (e.g., set gas meters, remove the gas master meter, gas up the system, purge the legacy gas system and transition customers to direct SoCalGas gas service). The electric IOU or its contractor performs all remaining electric-specific work.

In the case of communication infrastructure, the electric IOU reaches out to the serving communication infrastructure providers (CIPs) because most electric IOUs already have established business relationship with the CIP as they work together on pole attachments projects and overhead to underground conversion projects. The electric IOU contacts the serving CIP identified in the Mobilehome Park Utility Upgrade Program Application (MHP Application) to make them aware of the MHP Program and asks whether they are interested in participating in joint trench projects. In the case of gas-only MHP projects, SoCalGas reaches out directly to the serving CIP and enquires about their interest in

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

participating in a joint trench project.

- b. In cases where SoCalGas needs to coordinate with an electric IOU on a MHP conversion project, all natural gas-specific costs are allocated to SoCalGas and all electric-specific costs are allocated to the electric IOU. PG&E and SCE have established methodologies and standards for allocating joint excavation costs among electric, gas utilities and CIPs based calculations on the depth and width of the joint trench. After reviewing the methodology, SoCalGas agreed to use PG&E’s and SCE’s established methodologies. In the case of SDG&E, SDG&E developed a methodology for allocating excavation costs between its own gas and electric services specific to the MHP Program. SoCalGas agreed to apply the same gas allocation percentage that SDG&E uses for its own natural gas service. The specific electric IOU’s allocations for joint trench that SoCalGas agreed to use are as follow:

<b>Line Trenching</b>		
Utility(s)	Gas	Electric
PG&E*	44%	56%
SDG&E	63%	37%
SCE	45%	50%

\*PG&E includes only main line; service lines have a different allocator (see below)

<b>Service Line Trenching</b>		
Utility(s)	Gas	Electric
PG&E*	50%	50%

<b>Paving</b>		
Utility(s)	Gas	Electric
PG&E	50%	50%
SDG&E	50%	50%
SCE	48%	52%

With respect to CIPs, SoCalGas would use the established cost allocation methodologies that the respective electric IOU uses with CIPs for joint trench projects.

- c. Based on the information provided by MHPs in the initial MHP Application period January 1, 2015 – April 1, 2015, and later prioritized by the Safety and Enforcement Division

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

---

(SED), 671 MHPs on the waitlist have identified SoCalGas as their natural gas service provider. Of these, 563 MHPs have identified SCE as their electric service provider, 49 MHPs have identified PG&E as their electric service provider, five MHPs have identified SDG&E as their electric service provider and 53 have identified a municipal utility or some other non-IOU as their service provider. This information is summarized in the table below.

ELECTRIC SERVICE PROVIDER	TOTAL	
	PARKS	SPACES
SCE	563	71,255
PG&E	49	6,226
SDGE	5	769
OTHER	53	7,260
<b>Total</b>	<b>670</b>	<b>85,510</b>

A list of the 671 MHPs is provided on the attached Excel file titled "ORA-SCG-001-CY3-Q1 (conf.)." **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.**

SoCalGas may also need to coordinate with the CIP serving the MHP. The specific CIP serving the MHP (e.g., Cox Communications, Spectrum [formerly Time Warner Communications] or AT&T) will be provided to SoCalGas and the electric IOU by each MHP in its completed MHP Application. The MHP Application is completed by MHPs after SED selects them for participation. The MHPs on the waitlist have not yet completed MHP Applications, thus SoCalGas cannot be certain which CIP(s) serve the MHPs or their residents.

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

---

**QUESTION 2:**

With regard to lines 4-5 on p. JSV-8, please describe the reason(s) that the mentioned 47 MHPs “did not qualify or elected not to participate”, as well as the number of MHPs to which each reason was ascribed.

**RESPONSE 2:**

The mentioned MHPs did not qualify or elected not to participate for the following reasons:

- Non-reimbursable costs are too high (17 parks)
- No response from owner or non-responsive (13 parks)
- Concerns with new meter locations (6 parks)
- Unspecified financial impacts and burdens (4 parks)
- MHP did not qualify (RV MHP, no permitted spaces, lease < 20 years) (3 parks)
- MHP already directly served (1 park)
- MHP only has 2 registered spaces of 22 (1 park)
- MHP Owner currently dealing with another major project is no longer interested (1 park)
- MHP Owner believes their system is in good condition (1 park)

**SOUTHERN CALIFORNIA GAS COMPANY**  
**APPLICATION FOR APPROVAL TO EXTEND THE MOBILE HOME PARK UTILITY**  
**UPGRADE PROGRAM**  
**(A.17-05-007)**  
**(DATA REQUEST ORA-SCG-001-CY3)**

---

**QUESTION 3:**

With regard to Table 2 on p. JSV-8:

- a. How many of the participating MHPs were converted or scoped for conversion of gas only, for electric only, or both?
- b. How many of the participating MHPs were converted or scoped for conversion with the participation of another utility? Please identify which utility(-ies) were involved, the number of MHPs associated with each utility, and the number of spaces associated with each MHP.

**RESPONSE 3:**

- a. Of the 202 MHPs currently in scope for SoCalGas' MHP Pilot Program, 21 have been gas only, none have been electric only, and 181 have been both gas and electric.
- b. Below is a table of the participating electric IOU, the number of MHPs shared with the electric IOU, and the total number of spaces associated with the MHPs. Some of these MHPs are currently in construction or are slated to be in construction in 2017.

Participating Utility	Number of MHPs	Number of Spaces
SCE	170	10,012
PG&E	10	387
SDG&E	1	152

**SOUTHERN CALIFORNIA GAS COMPANY**  
**APPLICATION FOR APPROVAL TO EXTEND THE MOBILE HOME PARK UTILITY**  
**UPGRADE PROGRAM**  
**(A.17-05-007)**  
**(DATA REQUEST ORA-SCG-001-CY3)**

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**QUESTION 4:**

With regard to Table 3 on p. JSV-10:

- a. How many of the waitlisted MHPs would require conversion of gas only, electric only, or both?
- b. How many of the waitlisted MHPs would possibly be converted with the participation of another utility? Please identify which utility(-ies) and the number of MHPs associated with each.

**RESPONSE 4:**

- a. Based on the information MHPs provided on the CPUC Form of Intent and the waitlist provided by SED, 54 MHPs have identified their electric service provider as a non-IOU. If non-IOUs continue not to participate, all or any of these 54 MHPs would be gas-only conversions. No MHPs would be electric only. 617 MHPs who identified their electric service provider as an IOU would be expected to be both gas and electric conversions.
- b. See Response to Question 1c.

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

---

**QUESTION 5:**

With regard to the potential safety benefit discussed in lines 18 through 21 on p. JSV-9, please explain:

- a. In its experience to date with the MHP upgrade program, to what extent has SoCalGas encountered unsafe conditions regarding extant master-meter MHP systems? Please specify the nature and extent of all safety violations encountered.
- b. Please quantify the benefit mentioned in line 9. Provide justification for this quantification.

**RESPONSE 5:**

- a. SoCalGas does not perform assessments of the safety of the MHPs' legacy systems and therefore has no record of safety violations. SED and the Department Housing and Community Development (HCD) may perform MHP inspections under their statutory authority; SoCalGas is not aware of the results of these inspections, if any.
- b. SoCalGas has not performed an analysis to quantify the safety and reliability benefits of replacing the MHPs' aging legacy systems with new, professionally installed systems that meet current gas and electric safety standards. However, the Commission provided some insights into the factors in D.14-03-021 at p. 16-17 (see excerpt below):

*As the OIR recognizes, however:*

*Inspections provide some information but are imperfect, since very often, little is visible--MHP natural gas systems typically run underground and some or all of electrical systems may also. Moreover, at some MHPs, particularly those where ownership has changed over time, the original construction records may no longer be available. (OIR 11-02-018 at 10.)*

*Further, given the construction of MHP distribution facilities over past decades and for private, submeter purposes, some systems may lack documentation (installation records, as-built drawings, maintenance records, etc.), may be operating on a "grandfathered" basis less stringent than current safety codes, may be incompatible with current utility standards and moreover, may be incapable of delivering power at the levels that contemporary appliances, electronics and vehicles require.*

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

**QUESTION 6:**

With regard to MHP resident participation in customer programs, as discussed in lines 19 to 21 on p. JSV-14, please explain:

- a. What are the numbers of new CARE, ESA, and medical baseline customers as a percentage of MHP residents who were converted to direct utility service?
- b. Has the percentage varied across completed MHPs?
- c. Provide an explanation of how outreach to residents takes into consideration possible future enrollment for CARE, ESA, and the medical baseline program.

**RESPONSE 6:**

- a. Below is a table with the number of new CARE customers and transferred medical baseline customers referred to on p. JSV -14 that have been converted and the percent that the new CARE enrollments and medical baseline customers transferred represent as a total of MHP spaces. SoCalGas' MHP Project does not track ESA customers.

<b>MHP</b>	<b>MHP Spaces</b>	<b>New CARE Enrollment</b>	<b>% of MHP Resident Spaces</b>	<b>Medical Baseline Transferred</b>	<b>% of MHP Resident Spaces</b>
MHP #1	82		0%		0%
MHP #2	25	11	44%		0%
MHP #3	52	3	6%		0%
MHP #4	182		0%		0%
MHP #5	98		0%	1	1%
MHP #6	97	4	4%		0%
MHP #7	46		0%		0%
MHP #8	34	7	21%		0%
MHP #9	104	1	1%		0%
MHP #10	47		0%	1	2%
MHP #11	13		0%		0%
MHP #12	186	11	6%		0%
MHP #13	83		0%		0%
MHP #14	23		0%		0%
MHP #15	45		0%		0%



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

(A.17-05-007)

(DATA REQUEST ORA-SCG-001-CY3)

MHP	MHP Spaces	New CARE Enrollment	% of MHP Resident Spaces	Medical Baseline Transferred	% of MHP Resident Spaces
MHP #16	107	5	5%	1	1%
MHP #17	94	2	2%		0%
MHP #18	36	4	11%		0%
MHP #19	47	3	6%		0%
MHP #20	228		0%		0%
MHP #21	32	13	41%		0%
MHP #22	32	12	38%		0%
MHP #23	114		0%		0%
MHP #24	40		0%		0%
MHP #25	55	1	2%		0%
MHP #26	56	8	14%		0%
MHP #27	182	15	8%		0%
MHP #28	103	3	3%		0%
MHP #29	101		0%	2	2%
MHP #30	79	8	10%		0%
MHP #31	43		0%		0%
MHP #32	47		0%		0%
MHP #33	141		0%		0%
MHP #34	53		0%		0%
MHP #35	71		0%		0%
MHP #36	33		0%		0%
MHP #37	21	11	52%		0%
MHP #38	22		0%		0%
MHP #39	34		0%		0%
MHP #40	70		0%		0%
MHP #41	24		0%		0%
MHP #42	125	4	3%		0%
MHP #43	28	5	18%		0%
MHP #44	71	1	1%		0%
MHP #45	182	1	1%		0%
MHP #46	42		0%		0%
MHP #47	27	1	4%		0%
MHP #48	27	1	4%		0%
MHP #49	51	9	18%		0%
MHP #50	79		0%	1	1%
MHP #51	49		0%		0%

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

(A.17-05-007)

(DATA REQUEST ORA-SCG-001-CY3)

<b>MHP</b>	<b>MHP Spaces</b>	<b>New CARE Enrollment</b>	<b>% of MHP Resident Spaces</b>	<b>Medical Baseline Transferred</b>	<b>% of MHP Resident Spaces</b>
MHP #52	152		0%	2	1%
MHP #53	64		0%		0%
MHP #54	23		0%		0%
MHP #55	82	1	1%		0%
MHP #56	38		0%		0%
MHP #57	306	1	0%		0%
MHP #58	52		0%		0%
MHP #59	40	25	63%		0%
MHP #60	68	5	7%	1	1%
MHP #61	36		0%		0%
MHP #62	68		0%		0%
MHP #63	45	4	9%		0%
MHP #64	51		0%		0%
MHP #65	69		0%		0%
MHP #66	44	2	5%		0%
MHP #67	177	4	2%		0%
MHP #68	25		0%		0%
MHP #69	25	7	28%		0%
MHP #70	27		0%		0%
MHP #71	94		0%		0%
MHP #72	23		0%		0%
MHP #73	99		0%	1	1%
MHP #74	109		0%		0%
MHP #75	24		0%		0%
MHP #76	65		0%	1	2%
MHP #77	33		0%		0%
MHP #78	13	1	8%		0%
MHP #79	63		0%		0%
MHP #80	21	5	24%		0%
MHP #81	30	5	17%		0%
MHP #82	37	15	41%		0%
MHP #83	66		0%		0%
MHP #84	118	3	3%		0%
MHP #85	161		0%		0%
MHP #86	64		0%		0%
MHP #87	19		0%		0%

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

<b>MHP</b>	<b>MHP Spaces</b>	<b>New CARE Enrollment</b>	<b>% of MHP Resident Spaces</b>	<b>Medical Baseline Transferred</b>	<b>% of MHP Resident Spaces</b>
MHP #88	91	11	12%		0%
MHP #89	49	10	20%		0%
MHP #90	97	6	6%		0%
MHP #91	30	1	3%		0%
MHP #92	44	15	34%	1	2%
MHP #93	46		0%		0%

- b. Yes, as shown in Response 6.a, the percentages of new CARE and transferred medical baseline customers vary across completed MHPs.
- c. Information on CARE, ESA, and medical baseline program is provided to MHP residents during the MHP resident forums. Residents can refer to this information in the future. Outreach to converted MHPs and enrollment into the CARE, ESA, and medical baseline program will continue after conversion and will be handled through SoCalGas' Customer Programs organization.

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

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**QUESTION 7:**

With regard to benefit “F. Access to Enhanced Customer Services and Smart Meter Benefits,” as discussed in lines 4 to 13 on p. JSV-15, please explain:

- a. To what extent have MHP residents demonstrated an interest in utilizing “online energy tools” in SoCalGas’ experience to date with the MHP upgrade program?
- b. To what extent do the “low-income customers and elderly customers” mentioned in line 13 have the ability (ie, possess a home computer with internet access or have internet access in a common area) to access online services, in SoCalGas’ experience to date with the MHP upgrade program?

**RESPONSE 7:**

- a. SoCalGas has not collected information specifically from MHP residents regarding their interest in utilizing “online energy tools.” Also, SoCalGas’ Advanced Meter installations are nearly complete. However, the following are statistics from SoCalGas’ general customer population that have advanced meters: 1/3 of all bill accounts have registered and have access to SoCalGas’ My Account website, and approximately 1/3 of residential bill accounts have accessed their energy data via My Account’s tool that allows customers to analyze their energy use, view their bill, and learn about energy-savings actions.
- b. Prior to the launch of the MHP Program, SoCalGas surveyed the general population MHP residents. The survey indicated that 64% of MHP residents had internet access at home.

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

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**QUESTION 8:**

With regard to the prioritization of MHPs for conversion, as discussed in lines 8 to 9 on p. JSV-18, please explain:

- a. How many MHPs does SoCalGas propose to convert from Category 2? How many spaces does that constitute?
- b. How many MHPs does SoCalGas propose to convert from Category 3? How many spaces does that constitute?
- c. How will SoCalGas identify which Category 3 MHPs to convert? Please explain the methodology and any assumptions SDG&E will use to identify Category 3 MHPs for conversion.
- d. How many MHPs in Categories 2 and 3 does SoCalGas expect will be found unqualified?
- e. How many MHPs in Categories 2 and 3 does SoCalGas expect will elect not to participate? Based on SoCalGas 'experience to date with the MHP upgrade program, what factor(s) or reason(s) does SoCalGas understand will drive MHPs' decision to participate. Do these reason(s) differ from those described in answer to question 1, and if so, why?

**RESPONSE 8:**

- a. If SoCalGas were to convert the MHPs in the order they appear on the prioritized list it received from SED, SoCalGas would expect to convert 73 MHPs from Category 2, which translates to a total of approximately 8,700 MHP spaces.
- b. Again, if SoCalGas were to convert the MHPs in the order they appear on the prioritized list it received from SED, SoCalGas would expect to convert 148 MHPs from Category 3, which translates to a total of approximately 17,300 MHP spaces.
- c. SED selects and provides to SoCalGas the MHPs in Category 2 and Category 3 for conversion. The responses to 8a. and 8b. above assume SED will follow the order of MHPs on the current prioritized list.
- d. Whether a MHP qualifies or not depends on the information it provides in its MHP Application. Separate from not qualifying, a MHP could fail or decline to execute a MHP Utility Upgrade Program Agreement. These items are learned after the MHP is selected for conversion. Thus, at this time SoCalGas is not aware how many Category 2 or 3 MHPs will

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

**(A.17-05-007)**

**(DATA REQUEST ORA-SCG-001-CY3)**

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not qualify, will be found ineligible, or will decline to execute the MHP Utility Upgrade Agreement.

- e. As described in response 8.d. above, SoCalGas is not aware how many of the MHPs in Category 2 and 3 will elect not to participate.