

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

(A.17-05-007)

(DATA REQUEST ORA-SCG-007-CY3)

QUESTION 1:

With regard to the treatment of permanent buildings and interspersed RV spaces, as discussed on pages DM-9 to DM-11 of Ch. 2, please explain:

- a. Why does SoCalGas propose only to-the-meter (TTM) treatment, and not also behind-the-meter (BTM) treatment, for permanent buildings?
- b. Why does SoCalGas propose both TTM and BTM treatment for interspersed RV spaces?
- c. What is the marginal cost of converting one additional permanent building? Please provide this information for gas-only conversions, electric-only conversions, both, and any conversions that would involve cost-sharing with another utility.
- d. What is the marginal cost of converting one additional interspersed RV space? Please provide this information for gas-only conversions, electric-only conversions, both, and any conversions that would involve cost-sharing with another utility.

RESPONSE 1:

- a. SoCalGas would like to maintain consistency with how common area facilities (also permanent buildings) are treated under the existing MHP pilot program, i.e., to cover the TTM-related costs.
- b. SoCalGas would like to maintain consistency in the treatment of RV spaces and MH spaces. However, gas BTM treatment is typically not required for RV spaces due to propane usage.
- c. SoCalGas does not track the costs of converting permanent buildings as they are not covered under the Pilot Program. Based on the proposal to cover only TTM work, it is expected that the cost of TTM conversion would not be materially different from that of a common area or a MH space of equal distance to the utility distribution system.
- d. SoCalGas does not track the costs of converting interspersed RV-permitted spaces as they are not covered under the Pilot Program. However, SoCalGas has converted RVs that reside on MH-permitted spaces. SoCalGas' current invoice data cannot be separated to identify the individual TTM and BTM cost of an RV-on-MH space (that is, an RV on a MH-permitted space); however, based on the scope of work, it is expected that the average per-space cost would not increase. Under the proposal, an RV space would receive TTM treatment like an MH space, therefore resulting in an immaterial change in TTM average per-space costs. Additionally, RV spaces typically do not require BTM treatment for gas service since most are served by propane, so there would be no BTM costs involved.