Mobilehome Park Utility Conversion Program

- **2011** WMA (Western Manufactured Housing Communities Assoc.) petitions CPUC (Calif. Public Utility Commission) to examine upgrading aging gas and electric distribution systems in mobilehome parks to enhance safety.
- **2014 –** CPUC establishes 3-year pilot program authorizing each Calif. investorowned utility company (So.Cal Gas & So.Calif.Edison) to convert 10% of mastermetered spaces to direct utility service. Park owners can submit applications to be considered for this pilot program.
- **2015** Utility upgrade pilot program starts on 1/1/2015 and is designed to end on 12/31/2017.
- **2018** CPUC undertakes a comprehensive evaluation of the pilot program to see if it should become permanent.
- **2020** CPUC established the Mobilehome Utility Conversion Program to continue converting MHP utility infrastructure until the end of 2030 with the goal of converting 50% of the spaces in each utility service.
- **2021** Program begins accepting applications for this program on 1/1/2021 and ends accepting applications on 3/31/2021. CPUC Safety and Enforcement Division (SED) created risk-prioritization list ranking park applications as per status of exiting master-metered systems. Category One had 586 parks (37,890 spaces); Category 2 had 971 parks (119,278 spaces).
- **2022** Quotas were established for each serving utility. The park conversion quotas for SCG and SCE were 3.3% of the parks that they serviced. In 2021, SCG converted 303 parks (22,534 spaces).
- **2023** Final reports from SCG and SCE on the total spaces they converted are to be submitted to CPUC by February 1, 2024.

Classification of Parks & Park Owner Responsibility

CPUC Categories – Park applications for the program had to be submitted by 3/31/2021 to HCD. HCD and CPUC reviewed the applications and placed each park in a Category depending on the status of primarily of the gas system in the park. Parks are required to have annual cathodic protection inspections that report the condition of the gas system.

Category 1 parks are the ones that have underlying infrastructure issues. Within the Category, parks are given a percentage rating with the highest rating being most critical to be addressed.

Category 2 parks are ones that are basically on a "watch list" and will be reevaluated in 2025.

Park Owner Responsibility and Involvement – If a park receives notice that they are due for the CPUC-UCP, there is a long period of time before actual construction begins. Park owner must agree giving up their Master Meter system and converting to service by one or both serving utilities (SCG and/or SCE). With this conversion program, the residents will be billed directly by the serving utility which in Costa Mesa would be SCG and SCE. A park owner can elect to only convert their gas system to SCG and not convert their electric system to SCE if the park has installed solar panels.

Engineering and plans will be done by SCG. New gas system will be installed in trenches in the middle of the street with new meters installed at the front of the mobilehome. All costs for the new gas system are normally assumed by SCG up to the meter. The park owner is responsible for "Beyond The Meter" (BTM) which entails new gas lines from the new meter installed at the front of the home to the gas line that enters the mobilehome which is usually towards the rear of the mobilehome.

Costa Mesa Mobile Home Parks

The current CPUC-UCP upgrade list shows 6 parks in Costa Mesa as Category 1 parks.

Costa Mesa Mobile Estates (113 spaces) has been selected for construction and is in the preliminary bidding stage.

Other Costa Mesa Parks included in the current 5-year conversion plan are:

Orange Coast MH Lodge (48 spaces)

Ocean Breeze Mobile Estates (43 spaces)

Vista Verde MHP (49 spaces)

Ponderosa Mobile Estates (56 spaces)

Rolling Homes MH (56spaces)

This is information received as of January 10, 2024, from a BTM approved contractor with CPUC.

Mobile Home Parks (MHP)

Mobilehome Park Utility Conversion Program



In February 2011, following a petition filed by the Western Manufactured Housing Communities Association (WMA), the CPUC opened a rulemaking proceeding (R.11-02-018) to examine what could be done to encourage owners of mobilehome parks and manufactured housing communities (both referred herein as MHPs) to upgrade aging gas and electric distribution systems in an effort to enhance both public safety and service reliability for MHP residents.

On March 13, 2014, the CPUC closed R.11-02-018 and issued Decision 14-03-021, establishing a three-year pilot program authorizing each California investor-owned utility to convert 10% of master-metered gas and/or electric MHP spaces within its operating territory to direct utility service. Due to overlap in operating territories, the utilities have jointly worked to develop processes and procedures that will allow the implementation of the pilot program

to be, generally, uniform and consistent throughout California. All utilities refer to the pilot program as the Mobilehome Park Utility Upgrade Program. The CPUC encourages municipal owned utilities (e.g., SMUD, LADWP, City of Long Beach, MID, etc.) and communication providers to participate in the upgrade program; however, these entities are not mandated to participate in the upgrade program.

The Mobilehome Park Utility Upgrade Program began on January 1, 2015 and was designed to end on December 31, 2017. The program was extended by the Resolutions E-4878 (issued September 28, 2017) and E-4958 (issued March 18, 2019). On April 26, 2018, R.18-04-018 in order "to undertake a comprehensive evaluation of the MHP Pilot and determine based upon that evaluation whether the program should be adopted as a permanent MHP Utility Program on a going forward basis and if so, under what provisions and guidelines." On April 24, 2020 Decision 20-04-004 was issued which established the Mobilehome Utility Conversion Program (MHP-UCP). The MHP-UCP is designed to continue converting MHP utility infrastructure until the end of 2030, with the goal of converting a total of 50% of the spaces in each utility territory to direct gas and/or electric utility service. The program began accepting applications for this new phase on January 1, 2021 and ended the application period on March 31, 2021.

SED created a risk-prioritization list which included new applicants, and parks still on the Pilot list from 2015, and ranked them according to their utility system's risk of failure. SED has delivered the priority list to all participating investorowned utilities, and the utilities are currently working with MHP Owners to plan and execute conversion projects. The priority list created in 2021 consisted of 586 Category 1 parks, which have a total of 37,890 spaces, and 971 Category 2 Parks, which have a total of 119,278 spaces. SED estimates the utilities will start the conversion process with these Category 1 Parks sometime before the second priority list is produced in July 2025. Category 2 Parks will be included in he next prioritization of the applicants in 2025.



CPUC Mobilehome Park Utility Conversion Program

Program Background and Phase II Considerations

Phase II Considerations

- MHP Electric Service System Standards or Upgrades
- · MHP Electrification Pilot Program
- Tenant Protections for MHP Residents

We Want To Hear From You!

A Prehearing Conference will be held on October 29, 2020 at 2:30 p.m.

roll Free Number: 1-877-937-0696 Participant Code: 7032008

If you need assistance in becoming a party in the proceeding (R.18-04-018) contact the CPUC Public Advisor:

Website: www.cpuc.ca.gov/pao Email: public.advisor@cpuc.ca.gov

To provide written public comment without becoming a party and read the comments of others, please visit the CPUC's Docket Card for the proceeding:

- Enter R.18-04-018
- Click on the proceeding link
- Click the Public Comment tab at the top of the page

The California Public Utilities Commission's (CPUC) Mobilehome Park Utility Conversion Program offers mobilehome parks and manufactured housing communities (collectively, MHPs) located within electric and/or natural gas company service areas conversion from master-meter/submeter natural gas and/or electric service to direct utility service.

Many MHPs built in California before 1997 did not receive electricity and/or natural gas directly from their local utility. Instead, the utility served a master-meter customer, such as an MHP owner or operator, who then distributed the electricity and/or natural gas to individual coaches at the MHP through a privately owned submeter system.

To increase safety and reliability in MHPs, this utility conversion program funds upgrades to the natural gas and/or electricity infrastructure within a utility's operating territory. This funding includes prioritizing those located in Disadvantaged Communities (DACs). Utility conversions increase the number of individuals eligible for low-income discount programs such as California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA).

To address safety risks due to aged infrastructure, the MHP Utility Conversion Program encourages MHP owners in coordination with their utility service provider to upgrade legacy natural gas and/or electricity systems at little to no-cost to the MHP owner. The conversion program includes common use facilities as part of the ongoing program; it does not cover beyond- the-meter costs to upgrade these facilities. This program also encourages upgrades of other utility services such as broadband.

Phase II in this CPUC proceeding will consider whether consumer protection and/or enforcement mechanisms can help ensure MHP owner participation in the program does not result in unreasonable cost increases to tenants.

Phase II will also explore the prospect of promoting MHP electrification. Finally, to further California's climate goals, Phase II will also explore the cost, feasibility, and challenges associated with the full electrification of MHPs currently served by natural gas or propane, including how to transition customers. For more information, please visit www.cpuc.ca.gov/mhpupgrade.









