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February 1, 2022

**VIA ELECTRONIC FILING**

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Mr. Simon Baker  
Interim Deputy Executive Director for Energy and Climate Policy  
Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue, Room 5th Floor  
San Francisco, CA 94102

Re: Liberty Utilities (CalPeco Electric) LLC (U 933-E) Mobile Home Park Utility  
Conversion Program Annual Report

Mr. Baker:

In accordance with California Public Utilities Commission Decision 20-04-004, Ordering Paragraph 10, Liberty Utilities (CalPeco Electric) LLC (U 933 E) (“Liberty”) submits its annual report on the program to convert master-metered mobile home parks to direct utility service.

Please address all formal and informal correspondence and staff requests regarding this filing to Cindy Fisher, at the address above.

Respectfully submitted,

*/s/ Cynthia M. Fisher*

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Cc: Lee Palmer, Director SED ([Leslie.Palmer@cpuc.ca.gov](mailto:Leslie.Palmer@cpuc.ca.gov))  
R.18-04-018 Service List

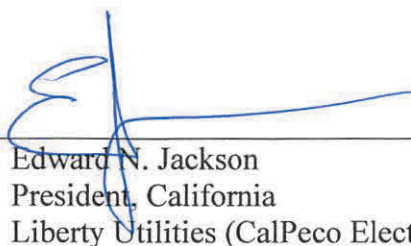
**OFFICER VERIFICATION**

Pursuant to Decision 20-04-004, Ordering Paragraph 12 and Rule 1.11 of the California Public Utilities Commission's Rules of Practice and Procedure, I provide the following verification.

I, Edward N. Jackson, hereby declare that I am the President of Liberty Utilities (CalPeco Electric) LLC, I have read the accompanying document, and the information set forth therein is true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed February 1, 2022 at Whittier, California.



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Edward N. Jackson  
President, California  
Liberty Utilities (CalPeco Electric) LLC



**Liberty Utilities (CalPeco Electric) LLC (U 933E)**  
**Mobile Home Park Utility Conversion Program Annual Report**  
**February 1, 2022**

**1. Introduction**

In Decision (“D.”)14-03-021, the Commission approved a three-year pilot program to incentivize the voluntary conversion of master-metered/sub-metered Mobile Home Parks and Manufactured Housing Communities (“MHP”) from a private distribution and service system to a direct utility distribution and service system (MHP Program). Under the MHP Program, Liberty Utilities (CalPeco Electric) LLC (“Liberty”), an electric service provider, in concert with Southwest Gas Corporation, a gas service provider, was authorized to convert approximately 10% of the master-metered/sub metered MHP spaces within its service territory over a three-year period.

On September 29, 2017, Resolution E-4878 extended the MHP Pilot Program to continue “until the earlier date of December 31, 2019 or the issuance of a Commission Decision for the continuation, expansion or modification of the program.”<sup>1</sup> Resolution E-4958 “authorized all participating electric and gas utilities to continue their MHP Pilot until the earlier date of either December 31, 2020, or the issuance of a Commission Decision for the continuation, expansion or modification of the program beyond December 31, 2020.”

D.20-04-004 established a 10-year program to convert MHPs from master-metered to direct utility service. The program commenced in 2021 and is to be ongoing until 100% (for small utilities) of the MHPs volunteering for the program are converted, or for 10 years.

Pursuant to D.14-03-021, and modified in D.20-04-004, Ordering Paragraph 10, utilities are required to submit annual reports to confirm progress in implementing the MHP Program. A template for the annual report has been refined by the Commission’s Safety and Enforcement Division and Energy Division in conjunction with the Technical Working Group, as ruled in the Assigned Commissioner’s Scoping Memo and Ruling dated August 31, 2018.<sup>2</sup>

Each utility is required to submit a status report, due on or before February 1, 2022, that includes the following items:

- Progress along the Pilot implementation timeline and where the utility is on that timeline
- Initial number of applications received

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<sup>1</sup> Resolution E-4878, OP 7, p. 22.

<sup>2</sup> R.18-04-018 Assigned Commissioner’s Scoping Memo and Ruling, #5, p. 20.



- Information about each MHP selected including general location, number of spaces, and “To The Meter” (TTM) and “Beyond The Meter” (“BTM”) construction costs incurred per space broken out to identify:
  - Civil work/trenching
  - Electric system construction costs
  - Other costs (permits and easements)
- Identification of problems, challenges, and obstacles involved with the MHP Pilot Program implementation

## 2. MHP Pilot Program Timeline

Liberty has identified five different periods, not including notification and completion, in the MHP Program timeline:

- Form of Intent (“FOI”) Submission - completed
  - FOI Submission Period- Liberty Utilities identified eight MHPs that submitted a FOI
- Park Prioritization Period - completed
  - One MHP (see below) was chosen by the Safety Enforcement Division (“SED”). No other prioritizations were necessary
- Application Period - completed
  - The MHP submitted an application
- Agreement Period - completed April – August 2019
  - TTM design work were submitted to MHP owners
  - BTM contractors were selected by MHP
  - BTM design work was completed
  - Meetings with MHP’s owners and residents were held
  - Agreements were signed
- Construction Period – work in progress May of 2019 – December of 2021
  - Progress benchmarks:
    - 265 spaces located in South Lake Tahoe
      - Project split into three phases
      - 106 spaces in phase one (phase two and three construction beginning in 2020)
      - TTM substructure excavation work completed
      - TTM cabling and transformer work completed
      - BTM work in progress
      - Conversion cutover of phase 1 in 2021
      - Conversion of phase two and three expected in 2022



MHPs Selected for Conversion				
MHP	Location	Number of Spaces	Utility Services	Overlapping Utility
II	South Lake Tahoe, El Dorado County	265	Electric/Gas	Southwest Gas

### 3. Challenges and Obstacles

- The building season in the Lake Tahoe Basin is limited. A moratorium on excavating exists from mid-October through mid-May. Inclement weather during the construction season can also cause work to be halted or delayed.
- The number of BTM contractors in the Lake Tahoe Basin is limited and the times the contractors are available for the BTM project do not necessarily coincide with the times they would be needed.
- Crew time committed to the project is limited because the company is small, and crews concurrently work on multiple projects.
- Other challenges include locating of existing utilities, snow load and removal considerations for meter placement, large trees, and obstructions on homeowner’s property.

### 4. Supplemental Cost and Safety Information

Data for the evaluation of the MHP Pilot Program pursuant to Rulemaking 18-04-018 and D.20-04-004 will be included in the MHP Annual Report subsequent to the year conversion work is completed. Per the Annual Report Template, “If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.” Liberty has no completed MHP conversions to report on for 2021.

### 5. Updated Program Assessment

Liberty has completed three of the eight MHPs prioritized for conversion to direct utility service. On April 18, 2017 Liberty filed Advice Letter 76-E to continue its MHP Utility Upgrade Program and provide additional customers the positive benefits of direct utility service including safety, reliability, and greater accessibility to programs such as California Alternate Rates for Energy, Energy Savings Assistance, and Medical Baseline Allowance. The priority ranking was as follows:



MHP Conversions Priority Tiers		
Tier	Number of MHPs	Number of Spaces
1	2	67
2	2	91
3	4	346

Of the remaining MHPs, one was master-metered only for natural gas, and one is currently in progress for conversion. Completion of the remaining eligible prioritized MHP conversions is estimated to occur in the ongoing MHP Program, beginning in 2021, and continuing through 2030.

### 6. Ongoing MHP Program

The table below shows MHP conversions priority tiers, number of MHPs, and number of spaces for the ongoing MHP program.

MHP Conversions Priority Tiers		
Tier	Number of MHPs	Number of Spaces
1	5	101
2	3	130
3	0	0

Out of the eight parks prioritized, one was not master-metered for electric and one has only recreational vehicle (RV) spaces. The remaining MHPs are scheduled for conversion as follows:

Construction Year	MHP City	Type of Service Conversion	Number of MHP Spaces per HCD
2021	SOUTH LAKE TAHOE	Elec/Gas	265
2022	SOUTH LAKE TAHOE	Elec/Gas	18
2023	SOUTH LAKE TAHOE	Elec/Gas	17
2023	SOUTH LAKE TAHOE	Elec/Gas	78
2024	SOUTH LAKE TAHOE	Elec/Gas	27
2025	SOUTH LAKE TAHOE	Elec only	30
2025	PORTOLA	Elec only	36

**END OF REPORT**