

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF JOE VELASQUEZ
REGARDING CONFIDENTIALITY OF CERTAIN DATA PURSUANT TO D.16-08-024**

I, Joe Velasquez, do declare as follows:

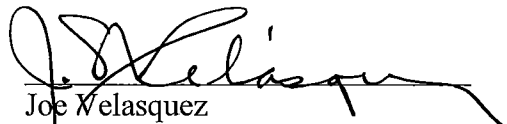
1. I am the Director of Master Meter Customer Programs for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Gina Orozco-Mejia, Vice President of Gas Operations. I have reviewed the data response in Application (A.) 17-05-008 to the Office of Ratepayer Advocates (“ORA”) titled “ORA-SDGE-001-CL8.” In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) D-16-08-024 to demonstrate that the yellow-highlighted confidential information (“Protected Information”) provided in Response 1.c to ORA-SDGE-001-CL8, is within the scope of data protected as confidential under applicable law, and pursuant to Public Utilities (“PUC”) Code § 583 and General Order (“GO”) 66-C, as described in Attachment A below.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of July, 2017, at Los Angeles, California.


Joe Velasquez
Director of Master Meter Customer
Programs

ATTACHMENT A

SDG&E Request for Confidentiality on the following information contained in ORA-SDGE-001-CL8

Location of Protected Information	Legal Authority	Narrative Justification
Data Request ORA-SDGE-001-CL8 in A.17-05-008, yellow-highlighted cells in Response 1.c.	GO 66-C Section 2.2(b) Gov't Code §§6254(k), 6254.7 (d); Evidence Code §1060; Civil Code §3426 <i>et seq.</i>	The yellow-highlighted cells contain MHP names. This is market-sensitive information that, if revealed, could put the MHP at an unfair business disadvantage because it provides nonpublic information regarding MHP program participation.

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QUESTION 1:

With regard to lines 3 to 5 on p. JSV-5:

- a. Please describe and explain SDG&E's strategy for coordination with other utilities as part of the MHP program.
- b. Please describe the methodology SDG&E uses to allocate costs with any utility with which SDG&E 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:

Please note that the yellow highlighted information in Response 1.c is confidential and protected material pursuant to PUC Section 583, GO-66C and D.16-08-024.

- a. In the case of energy infrastructure, San Diego Gas & Electric Company (SDG&E) has coordinated with Southern California Gas Company (SoCalGas) on one mobilehome park (MHP) where SoCalGas is the natural gas service provider and SDG&E is the electric service provider. In this case, MHP personnel from each utility work together to coordinate outreach, planning, design and construction. SDG&E 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, SDG&E or its contractor will perform all electric-specific work (e.g., pull wire, tie in transformers, remove the electric master meter, set electric meters and transition customers to direct SDG&E electric service) and SoCalGas will perform 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 natural gas service).

In the case of communication infrastructure, SDG&E reaches out to the serving communication infrastructure providers (CIPs) identified by the MHP in the Mobilehome Park Utility Upgrade Program Application (MHP Application) to make them aware of the MHP Pilot Program and to ask whether they are interested in participating in a joint trench project. To date, only Cox Communications (Cox) has elected to participate in one MHP conversion project. SDG&E coordinated with Cox in the planning, design and civil

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construction.

- b. For the one MHP identified in Response 1(a) as having overlap between SDG&E and SoCalGas: all natural gas-specific costs are allocated to SoCalGas; all electric-specific costs are allocated to SDG&E; and joint excavation and paving costs are shared between SoCalGas and SDG&E. SDG&E allocates MHP excavation costs as follows: 63% to natural gas and 37% to the electric. The allocation between gas and electric was based on an average joint trench installation where the total depth required would be 56 1/8". The gas would use 35 3/8" and the electric would use 20 3/4". For SDG&E the allocation of the trench costs between gas and electric calculates to 63% of the trench for gas and 37% for electric. The surface restoration costs would be split equally between gas and electric. Consistent with this approach, joint excavation costs are allocated 63% to SoCalGas and 37% to SDG&E. The joint paving work is allocated 50% to SoCalGas and 50% to SDG&E.

With respect to the one MHP for which Cox elected to participate with SDG&E, SDG&E allocated the costs to Cox consistent with SDG&E's existing Master Joint Trench Agreement that is used for new business and overhead-to-underground conversion projects.

- c. SDG&E has identified five MHPs on the waitlist for which SoCalGas is the natural gas service provider and SDG&E is the electric service provider. Conversion for these MHPs will require coordination with SoCalGas. The following table lists the five MHPs:

MHP Name	# MHP Spaces
[REDACTED]	192
[REDACTED]	312
[REDACTED]	132
[REDACTED]	61
[REDACTED]	72
Total	769

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

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QUESTION 2:

With regard to line 11 on p. JSV-7, please describe the reason(s) that the mentioned 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:

- Reimbursable costs cannot be carried (5 parks)
- Non-reimbursable costs are too high (7 parks)
- Specific provisions within the Application were unacceptable (4 parks)
- Other reasons: recent upgrade to meter pedestals (1 park)
- Other reasons: no response from owner (1 park)
- Ineligible: program requires 20-year lease. Did not meet requirement (1 park)

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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. All 30 MHPs in scope for SDG&E's MHP Pilot Program have been both electric and gas conversions.
- b. One MHP is in the service area shared with SoCalGas (i.e., SoCalGas provides natural gas service and SDG&E provides electric service). This MHP has 152 spaces.

Cox Communications participated in the conversion of one MHP; that MHP has 130 spaces.

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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 provided by MHPs currently on the waitlist, zero (0) MHPs would be gas only, 16 would be electric only and 123 would be both gas and electric conversions.
- b. See Response to Question 1(C).

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QUESTION 5:

With regard to the potential safety benefit discussed in lines 6 through 12 on p. JSV-9, please explain:

- a. In its experience to date with the MHP upgrade program, to what extent has SDG&E 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. SDG&E 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; SDG&E is not aware of the results of these inspections, if any.
- b. SDG&E 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.

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QUESTION 6:

With regard to MHP resident participation in customer programs, as discussed in lines 1 to 5 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, ESA and medical baseline customers at the MHPs that have been converted as of the filing date of A.17-05-008 (i.e., May 5, 2017).

MHP	No. of Spaces	New CARE/FERA Customers	% of MHP Resident Spaces	New MBL Customers	% of MHP Resident Spaces	New ESA Customers	% of MHP Resident Spaces
MHP #1	46	8	17%	3	7%	1	2%
MHP #2	41	6	15%	1	2%	0	0%
MHP #3	37	20	54%	0	0%	1	3%
MHP #4	67	2	3%	0	0%	0	0%
MHP #5	97	14	14%	5	5%	0	0%
MHP #6	123	0	0%	4	3%	0	0%
MHP #7	130	0	0%	0	0%	0	0%
MHP #8	75	0	0%	4	5%	0	0%
MHP #9	129	0	0%	2	2%	0	0%
MHP #10	184	9	5%	3	2%	0	0%
MHP #11	106	0	0%	0	0%	0	0%
MHP #12	151	5	3%	1	1%	0	0%
MHP #13	93	0	0%	0	0%	0	0%
MHP #14	112	2	2%	1	1%	0	0%
MHP #15	113	8	7%	1	1%	0	0%

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- b. Yes, as shown in Response 6.a, the percentages of new CARE, ESA and 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 SDG&E's Customer Programs organization.

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QUESTION 7:

With regard to benefit “F. Access to Enhanced Customer Services and Smart Meter Benefits,” as discussed in lines 7 to 15 on p. JSV-14, please explain:

- a. To what extent have MHP residents demonstrated an interest in utilizing “online energy tools” in SDG&E’s 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 SDG&E’s experience to date with the MHP upgrade program?

RESPONSE 7:

- a. SDG&E has not collected information specifically from MHP residents regarding their interest in utilizing “online energy tools.” However, the following are statistics from SDG&E’s general customer population: 60% of all bill accounts have registered and have access to SDG&E’s authenticated My Account website, and approximately 13% of residential bill accounts have accessed their energy data via My Account’s “My Energy” tool that allows customers to analyze their energy use, view their forecasted bill, and learn about energy-savings actions.
- b. Prior to the launch of the MHP Program, SDG&E surveyed the general population of MHP residents. The survey indicated that 73% of MHP residents had internet access at home.

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QUESTION 8:

With regard to the prioritization of MHPs for conversion, as discussed in lines 2 to 3 on p. JSV-18, please explain:

- a. How many MHPs does SDG&E propose to convert from Category 2? How many spaces does that constitute?
- b. How many MHPs does SDG&E propose to convert from Category 3? How many spaces does that constitute?
- c. How will SDG&E 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 SDG&E expect will be found unqualified?
- e. How many MHPs in Categories 2 and 3 does SDG&E expect will elect not to participate? Based on SDG&E's experience to date with the MHP upgrade program, what factor(s) or reason(s) does SDG&E 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 SDG&E were to convert the MHPs in the order that they appear in the prioritized list provided by CPUC's Safety and Enforcement Division (SED), SDG&E would expect to convert 12 MHPs from Category 2, which translates to a total of 2,112 MHP spaces.
- b. Again, if SDG&E were to convert the MHPs in the order that they appear in the prioritized list provided by SED, SDG&E would expect to convert 32 MHPs from Category 3, which translates to a total of 4,714 MHP spaces.
- c. SED selects and provides to SDG&E the MHPs in Category 2 and Category 3 for conversion. The responses to 8.a. and 8.b. above assume SED will follow the order of MHPs in the current prioritized list.
- d. Whether a MHP qualifies or not depends on the information it provides in its MHP Utility Upgrade Program Application. Separate from not qualifying, a MHP could fail or decline to execute a MHP Utility Upgrade Agreement. These items are learned after the MHP is selected for conversion. Thus, at this time SDG&E is not aware how many Category 2 or 3

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

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