

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**APPLICATION FOR APPROVAL TO EXTEND THE MOBILE HOME PARK UTILITY**  
**UPGRADE PROGRAM**

**(A.17-05-008)**

**(DATA REQUEST ORA-SDGE-013-CL8)**

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**QUESTION 1:**

Please explain how many MHPs that have been scoped for participation in the MHP Upgrade Pilot, completed by the pilot, or placed on the waitlist given in the spreadsheet ORA-SDGE-005-CL8-Q2, **are not parks that primarily serve long-term, permanent residents.** For purposes of this question, please identify all campgrounds, short-term RV parks, short-term mobile-home parks, or other parks that do not primarily serve long-term, permanent residents. Identify these parks by name, waitlist number (given in ORA-SDGE-005-CL8-Q2), and split of MHP spaces versus RV spaces.

**RESPONSE 1:**

Of the MHPs within the scope of SDG&E's MHP Pilot Program, SDG&E is not aware that any do not primarily serve long-term, permanent residents. With respect to MHPs on the waitlist, SDG&E has not gathered information beyond the CPUC's Form of Intent and cannot confirm this information for those MHPs.

Of the 30 MHPs within the scope of SDG&E's MHP Pilot Program, SDG&E is not aware that any have campgrounds, or that are short-term RV parks or short-term MHPs, or do not primarily serve long-term, permanent residents. With respect to MHPs on the waitlist, SDG&E has not gathered information beyond the CPUC's Form of Intent and cannot confirm this information for those MHPs.

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**QUESTION 2:**

Please explain how many MHPs that have been scoped for participation in the MHP Upgrade Pilot, completed by the pilot, or placed on the waitlist given in the spreadsheet ORA-SDGE-005-CL8-Q2, **are parks that primarily serve long-term, permanent residents but also contain a sub-area that does not serve such long-term, permanent residents.** For purposes of this question, please identify all parks with such sub-areas, including campgrounds, short-term RV parks, short-term mobile-home parks, or other sub-areas that do not primarily serve long-term, permanent residents. Identify these parks by name, waitlist number (given in ORA-SDGE-005-CL8-Q2), split of MHP spaces versus RV spaces, and number of spaces in the sub-area(s). If the park contains both interspersed RV spaces that target long-term, permanent residents as well as a sub-area that does not target long-term, permanent residents, please disaggregate the number of interspersed RV spaces from the number of spaces in the sub-area(s).

**RESPONSE 2:**

Of the MHPs within the scope of SDG&E's MHP Pilot Program, SDG&E is not aware that any contain a sub-area that does not serve long-term, permanent residents. With respect to MHPs on the waitlist, SDG&E has not gathered information beyond the CPUC's Form of Intent and cannot confirm this information for those MHPs.

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**QUESTION 3:**

ORA understands that a census of MHPs in each utility's service territory was attempted during the OIR that produced the MHP Upgrade Pilot.

- a. Using this information, or any updated information that may exist, please provide an estimate of the number of MHPs in SDG&E's territory that chose not to submit a Form of Intent to participate in the pilot.
- b. What percentage of MHPs in SDG&E's service territory does this estimate represent?
- c. What percentage of MHP spaces in SDG&E's service territory does this estimate represent?
- d. How many total MHPs are estimated to be in SDG&E's service territory?
- e. How many total MHP spaces are estimated to be in SDG&E's service territory?

**RESPONSE 3:**

- a. Based on the initial database used to track the Forms of Intent (FOI), 225 Forms of Intent were received. We have estimated that there are 305 MHPs that potentially qualify for the MHP Pilot Program. Based on this, we estimate 80 MHPs chose not to submit a Form of Intent.
- b. The 80 MHPs represents approximately 26% of the 305 MHPs we have estimated.
- c. We estimate that the 305 MHPs represent 33,073 MHP spaces. The 225 MHPs that submitted FOIs represent 25,866 spaces, based on the information provided in the FOIs. We do not have an actual count of spaces for the 80 MHPs that did not submit an FOI. However, by subtracting known spaces (25,866) from our estimated spaces (33,073), we estimate that 7,207 spaces may be associated with the 80 MHPs that did not submit FOIs.
- d. We have estimated 305 MHPs are potentially eligible for the program. There are a few more MHPs in SDG&E's service territory that are not included in the 305 estimate because they are ineligible for the program (e.g., not sub-metered or with systems already directly served by the utility.)
- e. We estimate 33,073 spaces in the 305 MHPs are potentially eligible for the program.

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**QUESTION 4:**

Follow-up to Question 1 (d) of data request ORA-SDGE-006-CL8, regarding the treatment of interspersed RV spaces.

- a. SDG&E's response states, "SDG&E has converted RVs that reside on MH-permitted spaces."
  - i. How many parks contained an RV that resides on an MH-permitted space?
  - ii. How many such spaces were converted (per each park identified in (i) and in total)?
  - iii. If these spaces are permitted for MHs, not RVs, please explain why SDG&E decided to convert the space with BTM treatment specific to RVs rather than MHs, as explained in SDG&E's response: "Additionally, RV spaces typically do not require BTM treatment for gas service since most are served by propane. BTM treatment for electric service includes an electrical cord plugged into the pedestal and RV, rather than the installation of electrical conductors and conduit..."
  - iv. Please explain if SDG&E plans any additional work for such spaces, in the event the RV moves but the BTM conversion does not allow for an MH.
- b. Please explain the reasons for which SDG&E does not convert interspersed RV spaces that do not reside on MH-permitted spaces. To the extent possible and relevant, please reference and explain: any language in D.14-03-021 that SDG&E interprets as permitting the conversion of an RV if it resides on an MH-permitted space but not if it resides on another space; any liability concerns; any safety concerns; any other concerns.
- c. Please explain the extent to which an RV benefits from the conversion of the electrical system, given that RVs typically receive 30 or 50 amps, as is common to many MHPs prior to conversion.

**RESPONSE 4:**

- i. SDG&E has encountered 12 mobilehome parks that have at least one RV in mobilehome-permitted spaces.
- ii. We did not document this information.
- iii. Per the Mobilehome Park Utility Upgrade Program Agreement, "SDG&E will design and install the new distribution and service system up to the Service Delivery Point on

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a 'like for like' basis to the existing system." RVs in mobile home spaces with propane receive a gas stub to the location of the future "Service Delivery Point." Park Trailers/Park Models, also considered a type of RV but are more permanent structures, typically have existing natural gas service. For this latter category, the BTM treatment is similar to that of a mobile home. On the electric side, the "like for like" treatment for BTM would include an electrical cord plugged into the electrical pedestal versus a fixed installation attached to the RV.

- iv. SDG&E doesn't plan on any additional electrical work for such spaces in the event an RV moves out and is replaced with a MH. Any future requirements for utility service would be provided under the utility's existing distribution and/or service line extension tariff rules.
  
- b. If the space is not permitted for mobilehomes, SDG&E will not convert the space under the program but the owner may elect to pay for the conversion outside of the MHP Program or under the utility's existing distribution and/or service line extension tariff rules. Our understanding is that D.14-03-021 applies to mobilehome spaces, and that term is not defined further. SDG&E has converted mobilehome and RV spaces based on the plain language of D. 14-03-021 and after consulting with Safety and Enforcement Division MHP Program personnel.
  
- c. RVs benefit from conversion of their electrical systems by receiving a newly installed electric distribution systems that enhance safety and service reliability. Also, pursuant to the MHP Agreement section 6.1.5, "SDG&E will design and install the 'To-the-Meter' facilities to accommodate a service equivalent to the existing service. If the existing electric service is less than 100 amperes, the utility will design and install 'To-the-Meter' facilities to accommodate 100 ampere service as part of the MHP Program."