

February 1, 2024

***VIA ELECTRONIC FILING***

Leuwam Tesfai  
Deputy Executive Director for Energy and Climate Policy  
Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue, Room 5<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: EDTariffUnit@cpuc.ca.gov

**RE: PacifiCorp (U 901-E) Annual Report on the Mobile Home Park Utility Upgrade Program**

In accordance with California Public Utilities Commission (CPUC) and Decision (D.) 20-04-004, Ordering Paragraph 10, PacifiCorp submits its annual report on the program to convert master-metered mobile home parks (MHP) to direct utility service.

Xaa-wan'-k'wvt Village & Resort, reached out to PacifiCorp in 2023, to express interest in the California Mobile Home Park Conversion Program (CA MHP Conversion Program). PacifiCorp determined that the property qualifies for the conversion program. As of the end of 2023, the conversion project status is active. The Company received a Letter of Intent from the CPUC for this customer, and the Company received the CA MHP Conversion Program Application for this project on November 29, 2023. The Company is waiting for a quote from the contractor hired by the MHP Owner before moving forward with this project.

The lead time for transformers needed for this project is 8 to 18 months due to supply chain delays. The Company expects to finish this project by end of 2024 depending on the order date and delivery of the transformers, but this project may not be completed until 2025 depending on delays.

Because the rate impact of this cost is minimal (less than a fraction of a percent), the Company did not calculate the rate impact of the employee time spent on this project in 2023. Time spent on this project was 20.5 hours.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to the following:

California Public Utilities Commission

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By Email (**preferred**): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Pooja Kishore, Regulatory Manager, at (503) 813-7314.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew McVee', with a long horizontal flourish extending to the left.

Matthew McVee  
Vice President, Regulatory Policy and Operations

Enclosure

cc: Leslie Palmer, Safety and Enforcement Division  
R.18-04-018 Service List

Annual Report Template*		Report for calendar year: 2023			Per-year costs; not cumulative							
Descriptor		2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	
<b>Program Participation</b>												
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion	-	-	-								
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	-	-	-								
Disadvantaged Community (none in Serv Territory)	Number of converted spaces within geographic zones defined by SB 535 map.	-	-	-								
Rural Community**	Number of converted spaces within rural community	-	-	-								
Urban Community**	Number of converted spaces within urban community	-	-	-								
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	-	-	-								
<b>Completed Spaces</b>	<b>Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.</b>											
Number of TTM MH and Covered Common Area Locations Converted (Electric)		-	-	-								
Number of BTM MH Converted Register Spaces (Electric)		-	-	-								
<b>Cost Information</b>												
<b>To-The-Meter (TTM) - Capital Costs</b>												
<b>Construction Direct Costs</b>												
Civil/Trenching	To the Meter Construction costs for civil related activities	-	-	-								
Electric		-	-	-								
<b>Electric System</b>												
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	-	-	-								
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	-	-	-								
Design/Construction Management	Cost for engineering, design and construction inspection cost	-	-	-								
<b>Other</b>												
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations	-	-	-								
Other Labor (Internal)***		-	-	-								
Non-Labor	Permits	-	-	-								
Materials	meters, modules and regulators	-	-	-								
<b>Program - Capital Costs</b>	Costs that are inconsistent among the other IOUs, driven by utility specific business models or cost accounting practices. These costs should be separated out so that others do not compare costs that are not comparable with others.	-	-	-								

Project Management Costs											
Project Management Office (PMO)	Program management office costs (Project Management, schedulers, cost analysts and field engineers)	-	-	\$ 2,833							
Outreach											
Property Tax	Property tax on capital spending not yet put into service	-	-	-							
AFUDC	AFUDC is a mechanism in which the utility is allowed to recover the financing cost of it's construction activities. AFUDC starts when the first dollar is recorded on the project and ends when HCD complete the first inspection so that the new assets are in use by the residents.	-	-	-							
Other											
Labor (Internal)***		-	-	-							
Non-Labor	Utility specific overhead driven by corporate cost model	-	-	-							
<b>Subtotal: To-The-Meter (TTM) - Capital Cost</b>		<b>0</b>	<b>0</b>	<b>\$ 2,833</b>							
To-The-Meter (TTM) - Expense Costs											
Project Management Costs											
Project Management Office (PMO)	Program startup cost	-	-	-							
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	-	-	-							
Other											
Labor (Internal)	Program startup cost for supporting organizations	-	-	-							
Other Labor (Internal)***		-	-	-							
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	-	-	-							
<b>Subtotal: To-The-Meter (TTM) - Expense Cost</b>		<b>0</b>	<b>0</b>	<b>\$ -</b>							

Beyond-The-Meter (BTM)- Capital Costs		Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and IOU to reimburse per D.14-02-021									
Civil/Trenching	NA	-	-	-							
Electric System		-	-	-							
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	-	-	-							
Material / Structures		-	-	-							
Other	BTM Permits, including HCD fees	-	-	-							
Other Labor (Internal)***		-	-	-							
<b>Subtotal: Beyond-The-Meter (BTM) - Capital Costs</b>		<b>0</b>	<b>0</b>	<b>\$ -</b>							
<b>Total: TTM &amp; BTM Costs</b>		<b>0</b>	<b>0</b>	<b>\$ 2,833</b>							

Rate Impact and Revenue Requirement											
Rate Impact	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	
Electric											
Average Rate w/o MMBA <sup>1</sup> recovery - Total System	-	-	N/A								
Average Rate w/ MMBA recovery - Total System	-	-	N/A								
Rate change - Total System	-	-	N/A								
% Rate change - Total System	-	-	N/A								
<b>Revenue Requirement</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>	<b>2029</b>	<b>2030</b>	<b>Present Value Revenue Requirement</b>
Electric Revenue Requirement - TTM	-	-	\$ 2,833								
Electric Revenue Requirement - BTM	-	-	\$ -								

<sup>1</sup> MMBA=Master Meter Balancing Account

\* Decision 20-04-004, Appendix B, Table 5: New Annual Report Data Template established in 2018, updated for 10 year period 2021-2030.  
An appendix can be provided to define each category if needed.

\*\* The Census Bureau identifies two types of urban areas:

- Urbanized Areas (UAs) of 50,000 or more people;
- Urbanized Clusters (UCs) of at least 2,5000 and less than 50,0000 people.

"Rural" encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is: <https://www.census.gov/geo/reference/urban-rural.html>.

\*\*\*Provide as many labor cost lines with descriptions as needed to clarify types of labor included in project.

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

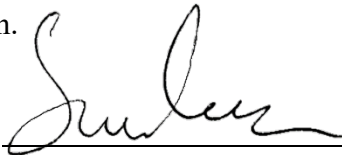
Order Instituting Rulemaking to Evaluate the  
Mobilehome Park Pilot Program and to  
Adopt Programmatic Modifications.

R. 18-04-018  
(Filed April 26, 2018)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **Mobile Home Park Utility Upgrade Program Annual Report** on all known parties to R.18-04-018 by transmitting an e-mail message with the document attached to each person named in the official service list.

Executed on **February 1, 2024**, at Portland, Oregon.



Santiago Gutierrez  
Coordinator, Regulatory Operations



California  
Public Utilities  
Commission



[CPUC Home](#)

## CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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**PROCEEDING: R1804018 - CPUC - OIR TO EVALUA**  
**FILER: CPUC**  
**LIST NAME: LIST**  
**LAST CHANGED: JANUARY 8, 2024**

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