

February 3, 2021

VIA ELECTRONIC FILING

Ms. Rachel Peterson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue, Room 5th Floor
San Francisco, CA 94102
rachel.peterson@cpuc.ca.gov

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

Ms. Peterson,

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

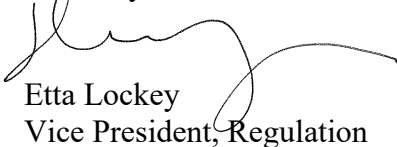
It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to the following:

By Email (preferred): 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,


Etta Lockey
Vice President, Regulation

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

PacifiCorp (U 901 E)
Mobile Home Park Utility Conversion Program Annual Report
February 3, 2021

1. Introduction

In D. 14-03-021, the Commission approved a three-year pilot program to incentivize voluntary conversion of master-metered/submetered Mobilehome Parks and Manufactured Housing Communities (MHP) from a private distribution and service system to direct utility distribution and service system (MHP Program). Under the MHP Program, PacifiCorp (PacifiCorp or the company) is authorized to convert approximately 10 percent of the master-metered/submetered 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.”¹ 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.”

Decision (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 for a period of 10 years, with a goal of converting one park a year or until 100% (for small utilities) of the MHPs volunteering for the program are converted.

Pursuant to 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, 2018.²

Each Utility is required to submit a status report that includes the following items:

- MHP Program timeline and where the utility is on that timeline
- Number of initial applications received
- Information about each MHP selected for conversion
- Problems experienced with the prioritization process and solutions

As part of the Mobilehome Park Utility Upgrade Pilot Program, the company received four Form of Intent (FOI) submissions for consideration, of which two projects were prioritized for conversion by the Commission’s Safety Enforcement Division (SED). Both MHP conversions were completed, and construction on the final of the two MHPs was completed by February of 2018, with all meters set and residents receiving their electric bills from PacifiCorp. As such,

¹ Resolution E-4878, Ordering Paragraph 7, p.22.

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

the company does not have additional prioritized parks identified for conversion until the 2021 FOI Submission Period and MHP Prioritization Period is completed.

2. MHP Program Timeline

PacifiCorp has broken the implementation of the MHP Program into six periods:

- FOI Submission Period
- MHP Prioritization Period
- Application Period
- Agreement Period
- Construction Period (to-the-meter and beyond-the-meter)
- Project Closure (inspection, project cutover)

2020 Update:

Because the company completed all the MHP conversions prioritized under the MHP Pilot Program in February 2018, there were no projects remaining on its prioritization list for the transition year 2020.

Pursuant to D.20-04-004, on June 8, 2020, PacifiCorp filed Advice Letter (AL) 618-E to update its MHP Program tariff and associated documents. Approval of AL 618-E is pending. As part of its outreach and education efforts, PacifiCorp sent letters to known and registered MHPs in the company's service territory, advising them of the upcoming Form of Intent period. The letter directed MHP owners to the Commission's MHP website for information and included a copy of the Form of Intent for their convenience. Included as Attachment A is an example of the letter that was sent. The company also updated its website with additional information about the new ongoing program.³ Additionally, as part of the implementation for the ongoing MHP program, the company has focused on developing and documenting internal processes and procedures to ensure the success of the program.

For the ongoing program, the FOI application period is currently underway (from January 1, 2021 to March 30, 2021). FOI applications received after March 31, 2021 will be on a waitlist until the SED's next prioritization review takes place. As soon as the company receives an updated prioritization list from the SED, the company will work with the selected mobilehome park owner to ensure completion of the standard, detailed application with the information necessary for engineering and planning, as well as execution of the necessary agreements.

Dependent on the timing of when the updated prioritization list from the SED is finalized, the company will further develop a more detailed timeline incorporating the above-listed project phases for the selected MHP(s).

³ <https://www.pacificpower.net/working-with-us/landlords-property-managers/california-mobile-home-park-upgrade.html>

3. Challenges and Obstacles

PacifiCorp completed the prioritized MHP conversions under the MHP Program pilot in 2018. The company has no additional challenges or obstacles to report at this time.

4. Supplemental Cost and Safety Information

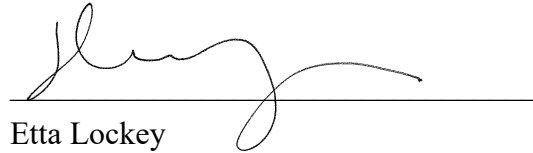
At this time there are no incremental or estimated costs being reported for the ongoing program. The company will include the supplemental cost and safety information (Appendix B of D.20-04-004) in its next report, once the prioritization and application period are completed.

VERIFICATION

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true on my own knowledge, except as to matters which are stated therein on information or belief, and as to those matters, I believe them to be true.

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

Executed on February 3, 2021, at Portland, Oregon.

A handwritten signature in black ink, appearing to read 'Etta Lockey', is written over a horizontal line. The signature is fluid and cursive.

Etta Lockey

Vice President, Regulation

ATTACHMENT A

**PACIFICORP
MOBILEHOME PARK UTILITY
LETTER TO MHP CUSTOMERS**

December 15, 2020

Dear Mobile Home Park Owner or Manager,

Some mobile home parks (MHP) in California constructed before January 1, 1997 were provided utility service through a mastered metered system. In 2014, The California Public Utility Commission (CPUC) created the Mobilehome Park Utility Upgrade Pilot Program. The program requires Pacific Power to cover eligible costs associated with converting MHP residents' master-metered electric service to direct utility service. MHPs must be registered with the California Department of Housing and Community Development to participate in this program.

The benefits to you as an owner in converting to a direct utility service include no longer being responsible for reading meters, billing or dealing directly with residents regarding their energy service. This would become Pacific Power's responsibility. Your MHP and its residents would also benefit from a modern, professionally installed system to help ensure delivery of safe, reliable and affordable electricity.

MHP owners who choose to participate in this voluntary program can do so through an application process that begins with completing and submitting a CPUC Form of Intent to show interest and request to be included in the MHP program. The Form of Intent, and additional information on the program, can be found at www.cpuc.ca.gov/mhpupgrade/. We've also attached the form for your convenience.

Intent form(s) must be received during the 90-day enrollment period which begins January 1, 2021 and ends March 31, 2021. Be sure to keep a copy for your records. Please note that intent forms submitted prior to January 1 or after March 31 will not be accepted.

We're always here for you and ready to help. Please email MHPUtilityUpgrade@pacificpower.net or call us at 1-888-221-7070 if you have any questions. A specialist from our customer care team will be happy to assist you.

Thank you for being our customer.

Sincerely,

Pacific Power

Our vision is to be the best energy company in serving our customers and supporting our communities while delivering sustainable energy solutions for generations.