

# Energy Division Central Files Document Coversheet

**Directions:** Submit all documents and submittal questions to Energy Division Central Files via email [EnergyDivisionCentralFiles@cpuc.ca.gov](mailto:EnergyDivisionCentralFiles@cpuc.ca.gov)

1. Fill out coversheet completely. Coversheet can be embedded as page 1 of the electronic compliance filing, or can be submitted as a separate document that is attached to the email that delivers the compliance filing.
2. All documents are required to be submitted in an electronically *searchable* format.
3. Documents need to reference the reason for the mandate that ordered the filing in Section B or C. If you are unable to reference a proceeding or explain the origin of your filing, please contact Energy Division Central Files.

To find a proceeding number (if you only have a decision number), go to <http://docs.cpuc.ca.gov/DecisionsSearchForm.aspx>; enter the decision number, and the results shown include the proceeding number.

## A. Document Name

Today's Date (Date of Submittal) 2/5/2024

### Name:

1. Utility Name: Liberty Utilities (CalPeco Electric) LLC
2. Document Submission Frequency (Annual, Quarterly, Monthly, Weekly, Once, Ad Hoc): Annual
3. Report Name: Liberty's Amended MHP Utility Conversion Program Annual Report 2023
4. Reporting Interval (the date(s) covered by the data, e.g. 2015 Q1): 2023
5. Name Suffix: Cov (for an Energy Division Cover Letter), Conf (for a confidential doc), Ltr (for a letter from utility)
6. Document File Name (format as 1+2 + 3 + 4 + 5): Liberty's Amended Annual MHP Utility Conversion Program Report 2023

### Sample Document Names:

*Utility Name + Submittal Frequency + Report Name + Year + Reporting Interval*

*SCE Annual Procurement Report 2014*

*SDG&E Ad Hoc DR Exception 2015Q1 Conf*

*SEMPRA Monthly Gas Report 201602*

*SEMPRA Daily Gas Report 20160230* <no suffix for regular, non-confidential compliance data>

*SEMPRA Daily Gas Report 20160230 Cov*

*SEMPRA Daily Gas Report 20160230 Ltr*

7. Identify whether this filing is original or revision to a previous filing.
  - a. If revision, identify date of the original filing: [Click here to enter text.](#)

## B. Documents Related to a Proceeding

All submittals should reference both a proceeding and a decision, if applicable. If not applicable, leave blank and fill out Section C.

1. Proceeding Number (starts with R, I, C, A, or P plus 7 numbers): R.18-04-018
2. Decision Number (starts with D plus 7 numbers): D.20-04-004
3. Ordering Paragraph (OP) Number from the decision: OP10

## C. Documents Submitted as Requested by Other Requirements

If the document submitted is in compliance with something other than a proceeding, (e.g. Resolution, Ruling, Staff Letter, Public Utilities Code, or sender's own motion), please explain: .

# Energy Division Central Files Document Coversheet

## D. Document Summary

Provide a Document Summary that explains why this report is being filed with the Energy Division. This information is often contained in the cover letter, introduction, or executive summary, so you may want to copy it from there and paste it here.

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.

## E. Sender Contact Information

1. Sender Name: Dan Marsh
2. Sender Organization: Liberty Utilities (CalPeco Electric) LLC ("Liberty")
3. Sender Phone: 562-721-2435
4. Sender Email: Dan.Marsh@libertyutilities.com

## F. Confidentiality

1. Is this document confidential?  No  Yes
  - a. If Yes, provide an explanation of why confidentiality is claimed, a declaration of confidentiality, and identify the expiration of the confidentiality designation (e.g. Confidential until December 31, 2020.) [Click here to enter text.](#)

## G. CPUC Routing

Energy Division's Director, Edward Randolph, requests that you not copy him on filings sent to Energy Division Central Files. Identify below any Commission staff that were copied on the submittal of this document.

1. Names of Commission staff that sender copied on the submittal of this Document: Leslie Palmer

ver.7/6/2016



Liberty Utilities (CalPeco Electric) LLC  
701 National Avenue  
Tahoe Vista, CA 96148-9905  
Tel: 562-923-0711  
Fax: 562-861-5902

February 1, 2024

**VIA ELECTRONIC FILING**

***EnergyDivisionCentralFiles@cpuc.ca.gov***

Mr. Leuwam Tesfai  
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. Tesfai:

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 Dan Marsh, at the address above.

Respectfully submitted,

*/s/ Dan Marsh*

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Dan Marsh  
Senior Manager, Rates and Regulatory Affairs  
Email (preferred): Dan.Marsh@libertyutilities.com

Cc: Lee Palmer, Director SED (*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 (“Liberty”), 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, 2024 at Downey, California.

*/s/ Edward N. Jackson*

\_\_\_\_\_  
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, 2024**

#### **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, 2024, 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.

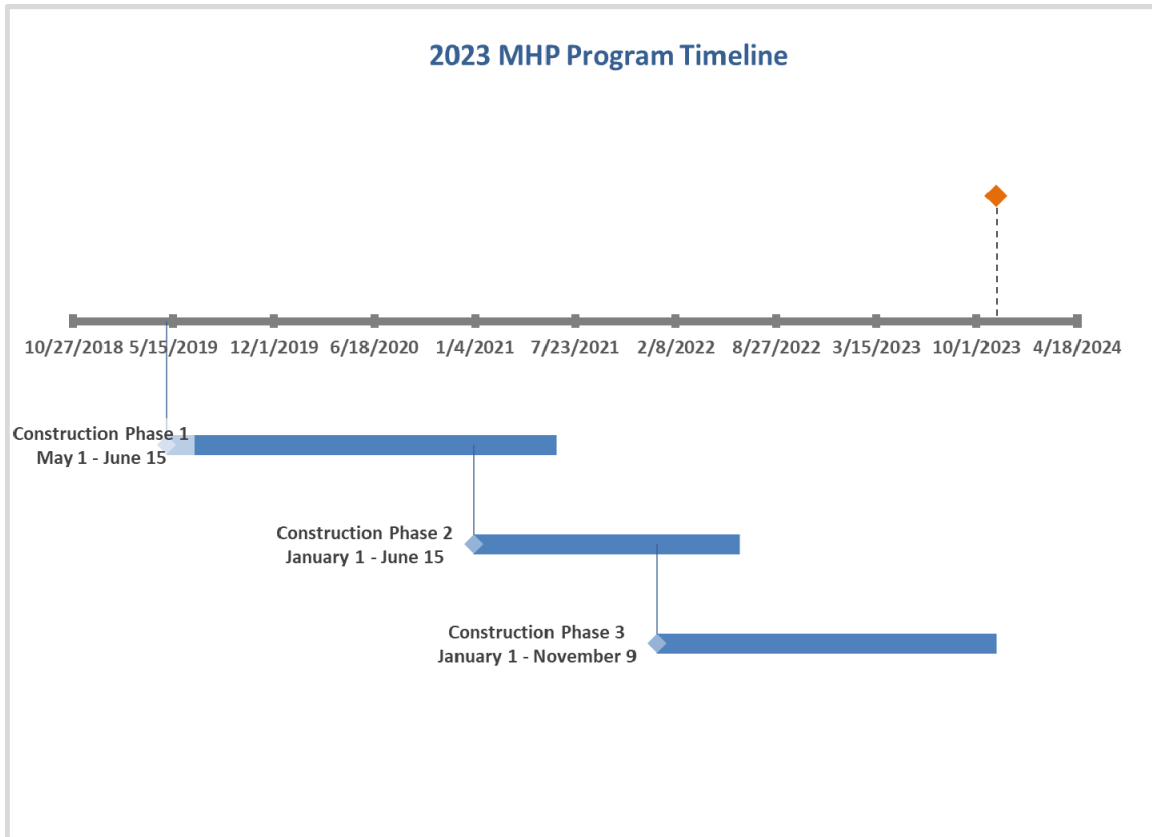


- Information about each MHP selected including general location, number of spaces, and “To The Meter” (TTM) and “Beyond The Meter” (“BTM”) construction costs incurred per space broken out to identify:
  - Civil work/trenching
  - Electric system construction costs
  - Other costs (permits and easements)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

## 2. MHP 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 – November of 2023
  - 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 completed
      - Conversion cutover of phase 1 in 2021
      - Conversion of phase two and three nearly complete in 2022
      - Final inspections completed in 2023



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 one completed MHP conversion to report on for 2023.

### **5. Updated Program Assessment**

Liberty has completed four 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. 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
2022	SOUTH LAKE TAHOE	Elec/Gas	265
2023	SOUTH LAKE TAHOE	Elec/Gas	18
2023	SOUTH LAKE TAHOE	Elec/Gas	27
2024	SOUTH LAKE TAHOE	Elec/Gas	17
2024	SOUTH LAKE TAHOE	Elec/Gas	78
2025	SOUTH LAKE TAHOE	Elec only	30
2025	PORTOLA	Elec only	36



Annual Report Template	Descriptor	2023
<b>Program Participation</b>		
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion	91
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	9
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 535 map.	0
Rural Community	Number of converted spaces within rural community	0
Urban Community	Number of converted spaces within urban community	265
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	NA
<b>Completed Spaces</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.	
Number of TTM MH and Covered Common Area Locations Converted (Gas)		NA
Number of TTM MH and Covered Common Area Locations Converted (Electric)		265
Number of BTM MH Converted Register Spaces (Gas)		NA
Number of BTM MH Converted Register Spaces (Electric)		265

<b>Cost Information</b>					
To The Meter - Capital Costs		Phase 3	Phase 2	Phase 1	
<b>Construction Direct Costs</b>					
Civil/Trenching					
Electric	To the Meter Construction costs for civil related activities	\$ 903,380	\$ 779,384	\$ 939,397	
Gas		NA			
Gas System		NA			
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)	NA			
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	NA			
<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)	\$ 271,568	\$ 274,789	\$ 384,860	



Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	\$ 58,003	\$ 51,502	\$ 65,057	
Design/Construction Management	Cost for engineering, design and construction inspection cost	\$ 35,000	\$ 35,000	\$ 35,000	
<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.				
<b>Project Management Costs</b>					
Project Management Office (PMO)	Program management office costs (Project Management, Program Management, schedulers, cost analysts and field engineers)				
<b>Outreach</b>					
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.	\$ 20,346	\$ 24,195	\$ 70,073	
<b>Other</b>					
Labor (Internal)		NA			
Non-Labor	Utility specific overhead driven by corporate cost model	NA			
<b>Sub-Total Capital Cost</b>		<b>\$ 1,288,297</b>	<b>\$ 1,164,869</b>	<b>\$ 1,494,387</b>	<b>\$ 3,947,553</b>



<b>To The Meter - Expense Costs</b>					
<b>Project Management Costs</b>					
Project Management Office (PMO)	Program startup cost	\$ -			
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	\$ -			
<b>Other</b>					
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>Sub-Total To The Meter</b>					
<b>Beyond The Meter - Capital</b>					
	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	\$ 793,580.00			
<b>Electric System</b>					
Labor	Labor and material for installing	\$ 477,000.00			
Material / Structures	BTM Electric infrastructure (e.g.	\$ 258,430.00			
<b>Gas System</b>					
Labor	Labor and material for installing	NA			
Material / Structures	BTM Gas infrastructure (e.g.	NA			
<b>Other</b>					
	BTM Permits, including HCD fees	\$ 70,332.00			
Other Labor (Internal)		\$ 209.33			
<b>Sub-Total Beyond The Meter</b>					
		<b>\$ 1,599,551</b>			
<b>Total TTM &amp; BTM</b>					
		<b>\$ 5,547,104</b>			



Rate Impact and Revenue Requirement												
Rate Impact	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	
<b>Gas</b>												
Average Rate w/o MMBA recovery - Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Average Rate w/ MMBA recovery - Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Rate Change - Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
% Rate Change - Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Average Rate w/o MMBA recovery - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Average Rate w/ MMBA recovery - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Rate Change - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
% Rate Change - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>Electric</b>												
Average Rate w/o MMBA recovery - Total System	NA	NA	NA	\$0.14122	\$0.15764	\$0.15843	\$0.17003	\$0.17813	\$0.18644	\$0.24980	\$0.24980	\$0.24980
Average Rate w/ MMBA recovery - Total System	NA	NA	NA	\$0.14123	\$0.15765	\$0.15848	\$0.17008	\$0.17819	\$0.18650	\$0.25080	\$0.25080	\$0.25080
Rate Change - Total System	NA	NA	NA	\$0.00001	\$0.00001	\$0.00004	\$0.00005	\$0.00006	\$0.00007	\$0.00100	\$0.00100	\$0.00100
% Rate Change - Total System	NA	NA	NA	0.005%	0.009%	0.027%	0.032%	0.034%	0.036%	0.400%	0.400%	0.400%
<b>Revenue Requirement</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Present Value Revenue Requirement</b>
Gas Revenue Requirement-TTM	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Electric Revenue Requirement-TTM	NA	NA	NA	\$2,280	\$4,469	\$13,429	\$16,757	\$18,933	\$21,109	\$23,285	\$25,461	\$99,249
Gas Revenue Requirement-BTM	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Electric Revenue Requirement-BTM	NA	NA	NA	\$2,174	\$4,261	\$12,801	\$15,974	\$18,048	\$20,120	\$22,194	\$24,268	\$94,598

END OF REPORT