

Energy Division Central Files Document Coversheet

Directions: Submit all documents and submittal questions to Energy Division Central Files via email 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) 2/2/2026

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 MHP Utility Conversion Program Annual Report 2026
4. Reporting Interval (the date(s) covered by the data, e.g. 2015 Q1): 2025
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 Utilities (CalPeco Electric) LLC Annual MHP Utility Conversion Program Report February 2, 2026

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: Elly O'Doherty
2. Sender Organization: Liberty Utilities (CalPeco Electric) LLC ("Liberty")
3. Sender Phone: (530) 807-8987
4. Sender Email: Elly.O'Doherty@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 2, 2026

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 Elly O'Doherty, at the address above.

Respectfully submitted,

/s/ Elly O'Doherty

Elly O'Doherty
Manager, Rates and Regulatory Affairs
Email (preferred):
Elly.O'Doherty@libertyutilities.com

Cc: Lee Palmer, Director SED (*Leslie.Palmer@cpuc.ca.gov*)
R.18-04-018 Service List



Liberty Utilities (CalPeco Electric) LLC (U 933E)
Mobile Home Park Utility Conversion Program Annual Report
February 2, 2026

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.”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.”

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.

D.24-12-037 adopted a 200-amp standard for the existing MHP Program. By September 19, 2025, all new participation agreements must specify that participants will receive a 200-amp default electrical service standard.

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, 2018.²

¹ Resolution E-4878, OP 7, p. 22.

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



Each utility is required to submit a status report, due on or before February 1, 2026, that includes the following items:

- Progress along the Pilot implementation timeline and where the utility is on that timeline.
- Initial number of applications received.
- 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.
 - The table below shows the MHPs prioritized through completion of the program in 2030.

MHP City	MHP County	MHP Spaces	Estimated Completion	Service Type
South Lake Tahoe	El Dorado	78	2026	Electric and Gas
South Lake Tahoe	El Dorado	17	2027	Electric and Gas
South Lake Tahoe	El Dorado	27	2028	Electric and Gas
South Lake Tahoe	El Dorado	30	2029	Electric only
Portola	Plumas	36	2030	Electric only

- Application Period
 - MHPs submit applications.
- Agreement Period
 - TTM design submitted to MHP owners.



- BTM contractors selected by MHP.
- BTM design work.
- Meetings with MHP’s owners and residents held.
- Agreements signed.
- Construction Period – work in progress.

2025 MHP Conversion				
MHP	Location	Number of Spaces	Utility Services	Overlapping Utility
I	South Lake Tahoe, El Dorado County	18	Electric/Gas	Southwest Gas

2026 MHP Conversion Timeline



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.
- Limitations of dig season were also extended due to heavy snow years that further shortened construction timelines.



- 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 2025.

5. Updated Program Assessment

Liberty has completed five of the MHPs prioritized for conversion to direct utility service.

Of the five remaining MHPs, two are master-metered only for electric. Completion of the remaining eligible prioritized MHP conversions is estimated to occur in the ongoing MHP Program, 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	3	74
2	2	114
3	0	0



	Descriptor	2025
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Program Participation		
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion	3
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	0
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	18
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	N/A

Completed Spaces	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.
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Number of TTM MH and Covered Common Area Locations Converted (Gas)		
Number of TTM MH and Covered Common Area Locations Converted (Electric)		18
Number of BTM MH Converted Register Spaces (Gas)		
Number of BTM MH Converted Register Spaces (Electric)		18

Cost Information		
To The Meter - Capital Costs		
Construction Direct Costs		
Civil/Trenching	To the Meter Construction costs for civil related activities	
Electric		\$ 330,660
Gas		
Gas System		
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)	
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	
Electric System		
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	\$ 48,016



Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	\$ 2,456
Design/Construction Management	Cost for engineering, design and construction inspection cost	\$ 14,400
Other		
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	
Program - Capital Costs	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, Program Management, schedulers, cost analysts and field engineers)	
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.	\$ 90,931
Other		
Labor (Internal)***		
Non-Labor	Utility specific overhead driven by corporate cost model	
Sub-Total Capital Cost		\$ 486,463
To The Meter - 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	
Sub-Total To The Meter		



Beyond The Meter - Capital	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	\$ 54,000
Electric System		
Labor	Labor and material for installing	\$ 218,627
Material / Structures	BTM Electric infrastructure (e.g.	\$ 63,855
Gas System		
Labor	Labor and material for installing	
Material / Structures	BTM Gas infrastructure (e.g.	
Other	BTM Permits, including HCD fees	\$ 8,528
Other Labor (Internal)***		
Sub-Total Beyond The Meter		\$ 345,010
Total TTM & BTM		\$ 831,473



Rate Impact and Revenue Requirement		
Rate Impact		2025
Gas		
Average Rate w/o MMBA recovery - Core		
Average Rate w/ MMBA recovery - Core		
Rate Change - Core		
% Rate Change - Core		
Average Rate w/o MMBA recovery - Non-Core		
Average Rate w/ MMBA recovery - Non-Core		
Rate Change - Non-Core		
% Rate Change - Non-Core		
Electric		
Average Rate w/o MMBA recovery - Total System		\$ 0.27654
Average Rate w/ MMBA recovery - Total System		\$ 0.27665
Rate Change - Total System		\$ 0.00011
% Rate Change - Total System		0.0398%



Footnotes

*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;
- Urban Clusters (UCs) of at least 2,500 and less than 50,000 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.

END OF REPORT

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, Eric Schwarzrock, 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 January 30, 2026, South Lake Tahoe California.



Eric Schwarzrock
President, California
Liberty Utilities (CalPeco Electric) LLC