



# Mobilehome Park Electric and Gas System Regulation History.

# Statutory Authority

- Original authority for enforcement was through the previous name of HCD – the Department of Industrial Relations, Division of Housing and Sanitation (Ch. 615, Stats. of 1929), later changing to the Division of Immigration and Housing, Housing and later broken out of Dept of Industrial Relations. The Department had general authority to adopt regulations.
- Chapter 2176 of the Statutes of 1961 (Health and Safety Code sections 18010, 18325 and 18370 of '61) specifically directed the Division of Housing to adopt regulations governing plumbing and electrical installations in parks.

# Regulation Clarifications

- There has been some type of regulation since 1928, but originally only dealing with sanitation and health issues.
- The State, local cities and later counties all have had some type of enforcement authority.
- Originally, all requirements were in statute with no regulations. This has gradually turned around to be the other way with little specific language in statute.
- Mobilehomes were considered vehicles (trailers) and were registered through DMV until 1981.

# Regulation Clarifications

- Up until 1976 it was not illegal to install gas piping under a mobilehome (vehicle). Although not permitted now, it is a gas piping installation restriction, not a mobilehome installation requirement and a home may be installed over existing gas piping.
- Separate regulations for Mobilehome Parks, Auto Courts, Travel Trailer, and Recreational Vehicle parks.
- Regulations are similar to building standards and become effective upon their adoption date and are not retroactive.

# Regulation History - Electric

- 1947 – Prior to '47 only parks in unincorporated areas were subject to the laws and regulations.
- After '47 all “trailer” parks were subject to the regulations and Auto Courts, Resorts and Motels were subject to local requirements.
- 1952 - the *Electrical Safety Orders and Rules for Overhead Line Construction* were first referenced.
- 1965 – first provisions for underground wiring; spelled out in regulation.
- 1965 - G.O. 95 first referenced.
- 1969 - California Electrical Code (CEC), Title 24, Part 3, added as primary reference.

# Regulation History - Electric

- 1970 – NEC added as the primary reference for underground wiring.
- 1975 – G.O.'s 95 and 128 referenced along with the NEC, but excluding NEC Articles 550 & 551. High voltage reference is now the California Administrative Code, Title 8, *High Voltage Safety Orders*.
- Dates of referenced codes updated in 1975, 1985 & 2004.
- 2006 – clarified that conflicts between the regulations, the G. O.'s and the CEC are settled in that order.

# Regulation History - Gas

- 1960 - Only LPG tanks were regulated before 1960.
- 1960 - Gas piping system installation, sizing, and testing requirements added to the regulations.
- 1969 - California Plumbing Code, Title 24, Part 4 added as primary reference.
- 1975 – CFR, Title 49, Parts 191 and 192 referenced.
- Aside from updates to the referenced codes, current natural gas piping requirements remain unchanged since 1985.

# Inspections

- Current statutory provisions call for HCD to have a goal of inspecting 5% of the parks per year (180 parks). Visual inspection of the utility systems is part of that inspection.
- We are just meeting the 5% inspections goal. Current funding does not permit a greater number of parks to be inspected.
- 28% of parks are under local enforcement authority. A city or county may assume enforcement for the parks in their jurisdiction.



# Inspections

- Systems in parks are also dealt with on a reactive basis by responding to complaints regarding gas and electrical issues.
- We don't do proactive inspections other than the limited visual inspections during park inspections.

# Inspections

Violations cited during park inspections are divided between the park and each resident.

While most park violations are electrical in nature, they are more user oriented then “system” related.

Most common park utility violations in 2010:

Exposed live parts	1,441
Lot equipment not accessible	953
Gas meter not supported	913
Misc. park electrical	815
Equip not approved for wet location	754
Equipment not grounded	636
Lot equip subject to vehicle damage	567

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