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SDG&E/SOCALGAS' PROPOSAL

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PRESENTATION AGENDA

1. Overview of Mobilehome Parks
2. SDG&E/SoCalGas' Response to Issues Raised in the OIR
3. SDG&E/SoCalGas' Recommendations
4. Feedback

OVERVIEW OF MOBILEHOME PARKS

- Private distribution systems behind utility owned/maintained master meter
- Utilities have no maintenance responsibilities past the master meter
- Master metered MHPs receive a master meter discount to adjust for the average costs avoided by the utility
- MHP owner/operators responsible for maintenance
- Government oversight provided by CPUC's Consumer Protection and Safety Division (CPSD) and CA Housing and Community Development (HCD)
- AB 622 established the existing statute that governs the transfer of MHP submetered systems to direct utility service (PUC Code Sections 2791 – 2799)
- Application of the statute varies among utilities
- # of MHPs - SDG&E ~ 700 | SoCalGas ~ 1400
- Voluntary transfers to-date: SDG&E – 3 | SoCalGas – 1



SDG&E/SOCALGAS' RESPONSE TO ISSUES RAISED IN THE OIR

1. Safety of utility service beyond the master meter at MHPs
 - Responsibility of MHP Owner/Operator per the statute
 - State agency inspections/audits per the statute
 - Utilities support state agencies (as needed)
2. Elimination of sub-metered MHP systems
 - MHP transfers are “voluntary” based on the existing statute
3. Cost allocation associated with transfers
 - Existing statute states that the cost shall not be borne by ratepayers or sub metered tenants
 - Past CPUC decisions aligned with the statute
 - Further legislative changes may be required to modify the existing statutory transfer process



SDG&E/SOCALGAS' RECOMMENDATIONS

- Propose a CPUC sponsored workshop(s) to:
 - Establish a standard transfer agreement per the Code § 2798
 - Establish a consensus amongst CA utilities regarding the eligibility requirements and system evaluation of MHPs per the Code § 2794
 - Establish a consensus amongst CA utilities regarding the implementation/application of the transfer process per the Code § 2793
- Propose a CPUC sponsored regional education forum to educate MHP Owners/Operators regarding the existing transfer process



FEEDBACK

- Questions/Comments