

February 1, 2016

VIA ELECTRONIC FILING AND **OVERNIGHT DELIVERY**

PacifiCorp U 901-E

Mr. Timothy Sullivan **Executive Director** California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102-3298

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

In accordance with California Public Utilities Commission Decision 14-03-021, Section 4.3.4. and ordering paragraphs 10 and 11, PacifiCorp submits its first annual report on the program to convert master-metered mobile home parks (MHP) 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

By fax:

(503) 813-6060

Informal inquiries may be directed to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,

R. Bryce Dalley

Bryce Dalley / ca Vice President, Regulation

Enclosure

* cc:

President Michael Picker

Commissioner Mike Florio

Commissioner Catherine J.K. Sandoval

Commissioner Carla J. Peterman

Commissioner Liane M. Randolph

Chief ALJ Karen Clopton

Edward Randolph, Director, Energy Division

Elizaveta Malashenko, Director, Safety Enforcement Division

Sunil Shori, Safety Enforcement Division

PACIFICORP

FIRST ANNUAL REPORT

MOBILE HOME PARK CONVERSION PROGRAM

February 1, 2016

PacifiCorp's California Rule 26 Mobile Home Park Conversion Program

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 is authorized to convert approximately 10 percent of the master-metered/submetered MHP spaces within its service territory over a three-year period.

Pursuant to D.14-03-021, Ordering Paragraph 10 requires annual reports be prepared to confirm the utilities' progress in implementing the pilot program. For the first required report, each utility is required to submit a status report due on or before February 1, 2016, that includes the following items:

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

2. MHP Program Timeline

PacifiCorp's timeline for the MHP Program is provided in Attachment A. PacifiCorp has broken the implementation of the MHP Program into six periods:

- Form of Intent (FOI) Submission Period
- MHP Prioritization Period
- Application Period
- Agreement Period
- Construction Period
- Project Closure

FOI Submission Period - Completed

PacifiCorp received four Form of Intent (FOI) from MHPs in its service territory interested in participating in the MHP Program.

MHP Prioritization Period - Completed

The California Public Utilities Commission Safety Enforcement Division (SED) reviewed the FOIs and notified PacifiCorp on May 22, 2015, that two MHPs had been prioritized for conversion under the MHP Program. There is no natural gas available in PacifiCorp's

California service territory so all conversions are electric only conversions. Additionally, no other utility provider has indicated an interest in coordinating with PacifiCorp to upgrade or convert their facilities within the selected MHPs. The following table lists the MHPs selected by SED for conversion.

MHPs Selected for Conversion

Name	City	County	Number of Qualifying Spaces	Service to Be Converted
Park A	Dunsmuir	Siskiyou	29	Electric Only
Park B	Mt. Shasta	Siskiyou	22	Electric Only

Application Period - Completed

Following receipt of notification from SED in May 2015 regarding the MHPs selected for conversion in PacifiCorp's service territory, PacifiCorp started communications with selected MHP candidates in July of 2015. PacifiCorp met with the selected MHPs on August 18, 2015, and each was provided a MHP Application. PacifiCorp received completed applications from both MHPs in September 2015.

Agreement Period - In Progress

The MHPs are currently selecting contractors to perform the beyond-the-meter work. Onsite meetings with the MHP owners had been scheduled for mid December, but storm conditions and outage restoration work required re-scheduling. PacifiCorp is in the process of rescheduling the onsite meetings to discuss the scope for the preliminary design work and beyond-the-meter work. Once the scope of work has been confirmed, estimated costs can be determined and the MHP Agreements completed.

Construction Period – Not Started

Construction is anticipated to start May 2016 and completed by October 2016.

<u>Project Closure - Not Started</u>

PacifiCorp anticipates being able to complete the conversion for both MHPs by the end of 2016.

3. Challenges and Obstacles

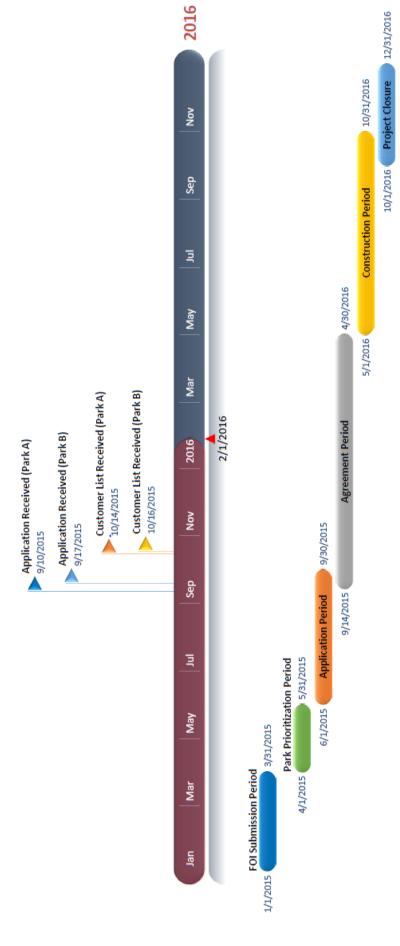
To date, PacifiCorp has not experienced any significant issues with implementing the MHP Program. The FOI Submission Period, MHP Prioritization Period, and Application Period were completed without incident. The only minor issue PacifiCorp has faced was related to storm weather, resulting in the company rescheduling meetings with MHP owners. However, PacifiCorp accounted for such delays in each of the timeline periods.

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ATTACHMENT A

PACIFICORP MOBILEHOME PARK UTILITY CONVERSION PROGRAM TIMELINE

PacifiCorp Mobilehome Park Utility Conversion Program Timeline



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 1, 2016, at Portland, Oregon.

R. Bryce Dalley

Vice President, Regulation