

SAN DIEGO GAS & ELECTRIC COMPANY
APPLICATION FOR APPROVAL TO EXTEND THE MOBILE HOME PARK UTILITY
UPGRADE PROGRAM

(A.17-05-008)

(DATA REQUEST ORA-SDGE-002-CL8)

QUESTION 1:

With regard to the “environmental issues” discussed from line 19 on p. LCH-3 of Chapter 2, please explain:

- a. The extent to which SDG&E has encountered such environmental or cultural issues that required remediation during its experience to date with the MHP upgrade pilot;
- b. The extent to which any waitlisted MHPs have indicated the known presence of such issues on their property.

RESPONSE 1:

- a. To date, two mobilehome parks (MHP) participating in the MHP pilot program have required / will require cultural remediation. SDG&E has not encountered any parks that require environmental remediation.
- b. SDG&E is not aware of any waitlisted MHPs with environmental or cultural issues on their property.

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QUESTION 2:

With regard to the TTM RFI and RFP described in lines 6 to 8 on p. LCH-5, please provide cost estimates or bids from those contractors that were selected and those contractors that were not selected as a result of this process

RESPONSE 2:

Pending review with ORA (meet-and-confer meeting set for July 6th)

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QUESTION 3:

With regard to the BTM RFI described in line 15 on p. LCH-5, please explain:

- a. Was this a separate process from the TTM RFI process?
- b. Are the contractors on the list that resulted from the BTM RFI process the same or different from those that participated in the TTM RFI process?

RESPONSE 3:

- a. No. The process for the BTM RFI was not separate from the TTM RFI process. Contractors participating in the TTM RFI were also asked to provide information for the BTM work.

Additionally, SDG&E held two informational contractor forums regarding the MHP pilot program. Contractors interested in being included on the BTM Contractor List were then asked to submit their company's information to SDG&E for inclusion.

- b. The majority of the BTM contractors on the list are different than those that participated in the TTM/BTM RFI process.

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QUESTION 4:

With regard to the legacy system discontinuance period, as discussed from line 18 on p. LCH-6, please explain:

- a. To what extent have MHP owners failed to comply with the 90-day window, in SDG&E's experience to date with the MHP upgrade program?
- b. What reason(s) have MHP owners provided to SDG&E in the event that they were not able to comply with the 90-day window?

RESPONSE 4:

- a. To date, 2 MHP owner/operators did not meet the requisite 90-day window to disconnect their legacy system.
- b. For the 2 MHPs that did not comply with the 90-day window, SDG&E understands that one MHP owner/operator wanted to keep their street lighting system in place using the legacy electric system, and the other had a dispute with one of its tenants regarding the tenant's lease agreement.

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QUESTION 5:

With regard to the application of residents for direct utility service, as discussed in line 3 to 5 of p. LCH-7, please explain:

- a. What is the optimal timing for residents to apply for direct utility service?
- b. How does the outreach plan introduce residents to the process for applying for direct utility service?
- c. In SDG&E's experience to date with the MHP upgrade program, what percentage of residents did not apply for direct utility service before the final space was prepared for cutover? How long after the final space was prepared did it take these residents to apply?

RESPONSE 5:

- a. Residents are able to apply for direct utility service beginning shortly after the commencement of TTM construction activities through completion of both TTM and BTM construction. The optimal timing for residents to apply is approximately 4 weeks prior to the completion of TTM civil construction. This timing has proven to be successful in preparing all residents for direct utility service prior to system cutover.
- b. During SDG&E's second residential forum, which typically occurs between two and four weeks prior to the commencement of TTM construction activities, the SDG&E Account Executive reviews the application process with forum attendees. Shortly after the commencement of TTM construction activities, detailed instructions (in English and Spanish) are provided to the MHP manager and/or owner/operator for distribution to their residents.
- c. In SDG&E's experience to date, only one resident did not complete their application for direct utility service prior to cutover.

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QUESTION 6:

With regard to the prioritization process, as discussed from line 4 on p. LCH-8, please explain:

- a. Please explain the nature and extent of the “lessons learned” mentioned in line 7;
- b. Please explain how the prioritization of MHPs would change under SDG&E’s proposal. If it will not change, please provide a justification for the recommendation of a re-prioritization process with respect to specific prioritization criteria.

RESPONSE 6:

- a. SDG&E is urging SED to conduct a new Form of Intent (FOI) process based on SED’s lessons learned as the overseer of this statewide pilot program. SDG&E does not have input on how program participants are selected.
- b. Under the pilot program, the utilities did not provide input or recommendations to SED regarding the prioritization criteria and how participants were selected, nor is SDG&E suggesting that the utilities do so now. As stated in the testimony (LCH-8, lines 6-7), one reason for suggesting a new FOI submittal process is to “provide MHPs not currently in Categories 1-3 with an additional opportunity to apply.”

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QUESTION 7:

With regard to the treatment of permanent buildings, as discussed from line 17 on p. LCH-8, please explain:

- a. In each MHP, how many permanent buildings that are residential homes served by the master meter has SDG&E encountered in its experience to date with the MHP upgrade program?
- b. How many MHPs have such a permanent building?
- c. What is the number of such permanent buildings in each MHP that was found to have at least one such permanent building?

RESPONSE 7:

- a. Not all MHPs participating in SDG&E's pilot program have permanent buildings that are residential homes served by the master meter.
- b. 3 out of 30 MHPs participating in SDG&E's pilot program have permanent buildings that are residential homes served by the master meter.
- c. Out of the three MHPs referenced in Response 7b, two have one permanent residential home, and the third MHP has a duplex.

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QUESTION 8:

With regard to the treatment of RV spaces, as discussed from line 7 on p. LCH-9, please explain:

- a. In SDG&E's experience to date with the MHP upgrade program, how many interspersed RV spaces have been encountered? How many interspersed RV spaces have been upgraded? Please provide a breakdown of these numbers for each MHP that SDG&E has completed to date.
- b. How many MHPs have such an interspersed RV space?
- c. What is the number of such interspersed RV spaces in each MHP that was found to have at least one such interspersed RV space?
- d. What percentage of the RV spaces that SDG&E has encountered in its experience to date with the MHP upgrade program belong to permanent, year-round residents?
- e. For what percentage of a given year is the average RV space occupied by its resident?

RESPONSE 8:

- a. To date, SDG&E has encountered two MHPs that have RV lots interspersed throughout the park, as designated on the park's permit-to-operate (PTO). One MHP had 77 permitted RV lots and the other MHP had 61 permitted RV lots, totaling 138 permitted RV lots. No permitted RV lots have been upgraded to date; if they were, these costs would be the responsibility of the MHP owner/operator.
- b. To date, SDG&E has encountered two MHPs that have interspersed permitted RV lots. One of the two MHPs declined participation in the MHP pilot program, citing the out-of-pocket costs as the reason.
- c. There were 77 permitted RV lots that were interspersed throughout the MHP that declined to participate in the pilot program, and 61 permitted RV lots interspersed throughout the MHP for which SDG&E has received an executed MHP Program Agreement.
- d. While SDG&E has not conducted any study regarding RV lots, information provided by the Park Manager of the participating MHP stated that approximately 80% of the

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residents residing on the permitted RV lots are under a 20-year lease agreement with the park.

- e. SDG&E has not conducted any study to provide quantitative information regarding resident occupancy within any given year.