

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 17, 2015

Advice Letter 3500-G/4466-E

Meredith Allen
Pacific Gas and Electric Company
Senior Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Subject: Pacific Gas and Electric Company Advice Letter 3500-G/4466-E, Mobilehome Park Utility Upgrade Program.

Dear Ms. Allen:

Pacific Gas and Electric Company (PG&E) Advice Letter 3500-G-B/4466-E-B and 3500-G-C/4466-E-C with a substitute sheet is approved effective August 29, 2014.

Decision (D.) 14-03-021 adopted a pilot program to encourage voluntary conversions of master-metered service at mobilehome parks to direct utility service. The decision also ordered certain California utilities, including PG&E, to implement the requirements of the program. Ordering Paragraph 9 required PG&E to file a Tier 2 Advice Letter (AL) for approval of new tariffs to establish a voluntary program that includes all of the Mobile Home Park (MHP) Program components in the Decision.

PG&E submitted AL 3500-G/4466-E on July 30, 2014, in compliance with D.14-03-021. As requested by Energy Division Staff, the AL was supplemented by ALs 3500-G-A/4466-E-A on September 25, 2014, 3500-G-B/4466-E-B on November 17, 2014, 3500-G-C/4466-E-C on December 22, 2014, and a substitute sheet on December 24, 2014. The supplements meet the requirements of Ordering Paragraph 9 of D. 14-03-021.

On August 19, 2014, the Western Manufactured Housing Communities Association (WMA) filed a protest. WMA withdrew its protest on August 22, 2014, after discussing its concerns with the utilities.

On August 19, 2014, the Californians for Renewable Energy (CARE) filed a protest to AL 3500-G/4466-E. CARE protests that the Decision failed to address the lack of transparency of construction costs of the MHP Program, and did not determine whether the MHP owner has the financial need to require ratepayers' assistances. The protest also objects to the contractor selection requirements stated in the Decision. The CARE protest raises issues based on the content and ordering paragraphs of D.14-03-021. CARE seeks to address these issues by way of protest to the Advice Letter. The issues would appropriately have been raised in the proceeding that resulted in the Decision. However, they are inappropriate for a protest of the Advice Letter that implements the decision. General Order 96-B excludes the types of issues raised by CARE. Section 7.4.2 specifically states that "a protest may not rely on policy objections to an advice letter where the relief requested in the advice letter follows rules or directions established by statute or Commission order applicable to the utility." CARE should have filed a petition for modification of D.14-03-021. As such, the CARE protest is invalid.

On September 15, 2014, the Office of Ratepayer Advocates (ORA) filed a late protest to AL 3500-G/4466-E. Energy Division (ED) directed PG&E to address the protest in supplements, and the protest is now moot. The supplemental ALs were not protested.

The ORA protest contained three sections. Section I of the ORA protest included issues concerning specific wording of ALs filed by other utilities and not of relevance to the wording in PG&E's AL.

Section II of the ORA protest states that vacant mobilehome park spaces should not be eligible for beyond-the-meter conversion work. Energy Division staff notes that only permitted spaces with Manufactured Housing units located in those spaces at the time of and up until completion of the MHP conversion are eligible for beyond-the-meter conversion under the program approved in D. 14-03-021. Any permitted space not occupied by the end of the specific park's conversion program will be subject to utility connection rules for beyond-the-meter work independent of the MHP Program. In its supplemental ALs 3500-G-A/4466-E-A, 3500-G-B/4466-E-B, and 3500-G-C/4466-E-C; PG&E addressed both of these issues by providing clarifying language to the AL.

Section III of the ORA protest recommended proportional adjustments to the Master Meter/Sub Meter Discounts. The proportional adjustment would correspond with the completion of conversions made prior to the completion of the entire park and cutover to the new system. D.14-03-021 requires the MHP owner operate and maintain the entire master-meter/submeter system until cutover to the new system. Since this protest relates to a situation (i.e. partial payment for partial conversion completion) that cannot occur under the terms of the Decision, the utility did not address this ORA concern. The protest is invalid because it relates to a situation that cannot occur under the terms of the Decision.

In summary, the issues raised in the WMA, CARE, and ORA protests were either moot, invalid, or withdrawn after discussions with the utility.

PG&E submitted ALs 3500-G-A/4466-E-A, 3500-G-B/4466-E-B, and 3500-G-C/4466-E-C as directed by staff to modify the language used in AL 3500-G-A/4466-E-A to incorporate the required changes necessary to fully comply with D. 14-03-021. These supplemental ALs were not protested. ALs 3500-G-B/4466-E-B and 3500-G-C/4466-E-C with a substitute sheet are approved.

Sincerely,



Edward Randolph
Director, Energy Division
California Public Utilities Commission

cc: Mark Pocta, Program Manager, Office of Ratepayer Advocates, Robert.Pocta@cpuc.ca.gov
Law Office of Anderson & Poole, Attorneys for the Western Manufactured Housing Communities Association, Epooles@adplaw.com
Michael E. Boyd, President, California for Renewable Energy, Inc. (CARE),
michaelboyd@sbcglobal.net
David K. Lee, Energy Division, dkl@cpuc.ca.gov

December 22, 2014

Advice 3500-G-C/4466-E-C
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Third Supplemental: Establishment of the Mobilehome Park
Conversion Program in Compliance with Decision 14-03-021**

PG&E hereby submits for filing the following changes to its tariffs. The revised tariff sheets are listed on Attachment 1 and are attached hereto.

Purpose

The purpose of this third supplemental advice letter (AL) is to make minor changes to the tariff sheets submitted within Advice 3500-G-B/4466-E-B, filed on November 17, 2014, consistent with Decision (D.) 14-03-021. These changes are made in accordance with General Order (GO) 96-B, General Rules 7.5.1, which authorizes utilities to make additional changes to an advice filing through a supplemental advice letter.

Background

On February 24, 2011, the California Public Utilities Commission (CPUC or Commission) opened Rulemaking (R.)11-02-018, to examine what the Commission can and should do to encourage the replacement by direct utility service of the master-meter/submeter systems that supply electricity, natural gas, or both to mobilehome parks (MHPs) located within the franchise areas of the investor-owned utilities (Utilities). Central to the Rulemaking is the question of how to ensure safe, reliable and fairly-priced delivery of electricity and/or natural gas to the residents of MHPs.

On March 14, 2014, the Commission issued D.14-03-021, approving a three-year “living pilot” with a goal to convert to direct service, approximately 10 percent of MHP residential spaces in each Utility’s service territory. The decision concluded that replacement of MHP sub-metered systems both “to the meter” and “beyond the meter” was necessary for the new distribution system to function and provide MHP residents with utility service on par with that of other residential customers.

On July 30, 2014, PG&E filed Advice 3500-G/4466-E to comply with Ordering Paragraph 9 of D.14-03-021. After the filing, the Utilities hosted conference calls with the Western Manufactured Housing Communities Association (WMA), the California Department of Housing and Community Development, the CPUC’s Safety Enforcement

Division (SED), and the CPUC's Energy Division (ED), to address any questions or concerns that they may have about the Advice Letters establishing the MHP Program. As a result of those discussions, PG&E filed supplemental Advice 3500-G-A/4466-E-A on September 25, 2014.

On November 17, 2014, PG&E submitted a second supplemental advice letter to provide additional clarity to the tariffs associated with the Mobilehome Park Utility Upgrade Program.

PG&E is submitting this third supplemental advice letter to provide additional clarity to the tariffs associated with the Mobilehome Park Utility Upgrade Program. This advice filing supplements, in part, and will not change the substance of the original Advice 3500-G/4466-E, 3500-G-A/4466-E-A and 3500-G-B/4466-E-B.

Tariff Revisions

PG&E is revising its Gas and Electric Rule No. 28, Section D. 8. Reimbursement to MHP Owner/Operator tariffs as requested and recommended by the Energy Division. This revision includes added language regarding when PG&E will terminate its service facilities at a location as close as possible to the exterior of common areas.

Protests

Pursuant to General Order 96-B, Section 7.5.1, due to the limited nature of this supplemental advice letter, PG&E is requesting the protest period not be reopened by the filing of this supplement.

Effective Date

PG&E requests that this Tier 2 supplemental advice letter become effective concurrent with Advice Letters 3500-G/4466-E, 3500-G-A/4466-E-A and 3500-G-B/4466-E-B.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.11-02-018. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submissions can also be accessed electronically at: <http://www.pge.com/tariffs>

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 M)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Jennifer Wirowek

Phone #: (415) 973-1419

E-mail: J6WS@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3500-G-C/4466-E-C**

Tier: 2

Subject of AL: **Third Supplemental: Establishment of the Mobilehome Park Conversion Program in Compliance with Decision 14-03-021**

Keywords (choose from CPUC listing): Compliance, Mobile Home Parks, Rules, Forms

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D. 14-03-021

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: Upon Commission approval

No. of tariff sheets: **10**

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: **New Gas Rule 28 (Mobilehome Park Utility Upgrade Program), New Electric Rule 28 (Mobilehome Park Utility Upgrade Program)**

Service affected and changes proposed: **New Gas Rule 28 (Mobilehome Park Utility Upgrade Program), New Electric Rule 28 (Mobilehome Park Utility Upgrade Program)**

Pending advice letters that revise the same tariff sheets: N/A

Pursuant to General Order 96-B, Section 7.5.1, due to the limited nature of this supplemental advice letter, PG&E is requesting the protest period not be reopened by the filing of this supplement.

California Public Utilities Commission

Energy Division

EDTariffUnit

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San Francisco, CA 94102

E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Meredith Allen

Senior Director, Regulatory Relations

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San Francisco, CA 94177

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**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

31772-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 1	
31773-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 2	
31774-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 3	
31775-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 4	
31776-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 5	
31777-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 6	
31778-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 7	
31779-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 8	
31780-G	GAS TABLE OF CONTENTS Sheet 1	31701-G
31781-G	GAS TABLE OF CONTENTS Sheet 6	31703-G



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 1

- A. **PURPOSE:** Pursuant to the California Public Utilities Commission’s (CPUC or Commission) Decision (D.)14-03-021, PG&E is offering the Mobilehome Park Utility Upgrade Program (“MHP Program”) as a voluntary three-year living pilot program to convert approximately 10 percent of eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (MHP) spaces within PG&E’s service territory. Subject to the requirements set forth in this Rule, all eligible submetered spaces (including both “To-the-Meter” and “Beyond-the-Meter”), and common use services within the entire MHP will be converted from master-metered natural gas distribution service to direct PG&E distribution and service (Distribution System). (N)
- B. **APPLICABILITY:** The MHP Program is available to all eligible MHPs within PG&E’s service territory as defined in Section C. Within the eligible MHPs, the only eligible Mobilehome spaces are those permitted by the California Department of Housing and Community Development (HCD) or its designated agency. Recreational vehicle parks and spaces are not eligible for the MHP Program.
- C. **PROGRAM ELIGIBILITY:**
1. MHPs must meet all of the following criteria to be eligible for the MHP Program. Program eligibility does not guarantee acceptance into the program, nor does it guarantee conversion to direct service from PG&E.
 - a. Receives natural gas through a utility owned master-meter, owns and operates the distribution system with at least a natural gas or electric associated submeters, and furnishes natural gas to residents. In cases where only one service is submetered the submetered service must be served by an Investor Owned Utility participating in the MHP Program.
 - b. Take natural gas service under one of the following rate schedules:
 - Gas Schedule GT
 - Gas Schedule GTL
 - c. Operate under a current and valid license from the governmental entity with relevant authority.
 - d. If operated on leased real property, the land lease agreement must continue for a minimum of 20 years from the time that the MHP Agreement is executed by PG&E.
 - e. Not be subject to an enforceable condemnation order and/or to a pending condemnation proceeding. (N)

(Continued)

Advice Letter No: 3500-G-C
 Decision No. 14-03-021

Issued by
Steven Malnight
 Senior Vice President
 Regulatory Affairs

Date Filed December 22, 2014
 Effective August 29, 2014
 Resolution No. _____



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 2

- C. PROGRAM ELIGIBILITY: (Cont'd) (N)
2. MHP Owner/Operators who elect to participate in the MHP Program must comply with all general rules, rights and obligations as set forth in this Rule. In addition, MHP Program participants must complete and/or execute the following documents:
- The CPUC's "Application for Conversion of Master Meter Service at Mobilehome Park or Manufactured Housing Community to Direct Service from Electric or Gas Corporation" ["CPUC's Form of Intent"]; and
 - The "Mobilehome Park Utility Upgrade Program Application" ["MHP Application"] (Form 79-1164); and
 - The "Mobilehome Park Utility Upgrade Program Agreement" ["MHP Agreement"] (Form 79-1165).
- D. MHP PROGRAM COMPONENTS:
1. CPUC's Form of Intent
- CPUC's Form of Intent will be accepted January 1, 2015, through March 31, 2015 (90-day period). The MHP Owner/Operator must complete and submit the CPUC's Form of Intent concurrently to both the Safety Enforcement Division (SED) of the CPUC and PG&E. CPUC's Form of Intent received after the 90-day period will be placed on a waiting list.
- a. Prioritization of CPUC's Form of Intent
- 1) CPUC's Form of Intent will be reviewed and prioritized as follows: (1) SED will prioritize MHPs that are gas only or dual system (gas and electric service), and (2) the California Department of Housing and Community Development (HCD) will prioritize MHPs that are electric only. MHPs whose CPUC's Form of Intent are accepted and prioritized by SED and HCD will be considered pre-qualified.
- 2) PG&E will receive a list of pre-qualified MHP Initial Applications from SED and HCD. PG&E will then contact the MHPs with the highest priority to participate in the MHP program until the program goal is achieved. PG&E will undertake its best efforts to communicate and coordinate with other utilities, municipal entities, and/or water and telecommunications providers to maximize efficiencies where possible.
- (N)

(Continued)



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 3

- D. MHP PROGRAM COMPONENTS: (Cont'd) (N)
- 2. MHP Application
 - a. After an MHP has been preliminarily contacted by PG&E to participate in the MHP Program, the MHP Owner/Operator will be provided with the MHP Application. The MHP Application requests additional information that the MHP Owner/Operator should provide to enable PG&E to commence the engineering and planning process for the new MHP distribution system.
 - b. Upon receipt of a completed MHP Application and necessary documentation from the MHP Owner/Operator, PG&E will commence engineering and planning a new MHP distribution system.
 - 3. MHP Agreement
 - a. After PG&E has engineered and planned the new MHP distribution system and PG&E has received the name of the MHP's Contractor and the cost for the "Beyond-the-Meter" work, PG&E will prepare the MHP Agreement for signature.
 - b. The conversion project will commence upon 1) the satisfactory resolution of any environmental, endangered species and/or cultural issues, 2) procurement of all required permits, and 3) payment for any applicable re-arrangements/relocation of facilities or addition of new gas facilities "Beyond- the-Meter" by the MHP Owner/Operator, 4) the execution of the MHP Agreement.
 - 4. Construction
 - a. PG&E will perform or select a qualified, licensed contractor to perform all necessary "To-the-Meter" construction, plumbing, and/or gas work as set forth in this Rule, and the MHP Agreement.
 - b. In common areas, consistent with existing requirements for PG&E to safely and efficiently connect its service facilities with its natural gas main pipeline facilities, PG&E will terminate its service facilities at a location as close as possible to the exterior of the building/structure nearest to PG&E's main pipeline facilities. The selected location shall be as close as practicable to the existing service delivery point(s); however, some flexibility in the construction approach is necessary to address various situations that exist in current installations.
 - c. The MHP Owner/Operator selected Contractor will perform all necessary "Beyond-the-Meter" construction, and/or gas plumbing as set forth in this Rule, and the MHP Agreement.
- (N)

(Continued)



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 4

- D. MHP PROGRAM COMPONENTS: (Cont'd) (N)
- 5. Cutover of Service
 - a. Cutover to direct service from PG&E will occur only after the inspection and approval of the "Beyond-the-Meter" facilities by the appropriate jurisdictional authorities.
 - b. The MHP Owner/Operator's MHP master-meter submetered discount will continue in full and will only cease at complete cutover of the entire system to direct service from PG&E.
 - c. MHP residents (tenants or owners of the Mobilehome) will become customers of PG&E and served in accordance with all applicable rates, rules and conditions set forth in PG&E's existing Tariffs, except as otherwise noted in this Rule.
 - 6. Ownership of Facilities After Conversion
 - a. Upon cutover to direct service, PG&E will own, operate, and maintain all of the "To-the-Meter" gas distribution and service systems within the MHP in accordance with all applicable rates, rules and conditions set forth in PG&E existing Tariffs.
 - b. The MHP Owner/Operator or MH Owner shall own, operate and maintain all "Beyond-the-Meter" facilities in accordance with State and local jurisdictional codes and ordinances.
 - c. PG&E shall have no liability for the MHP submetered system (referred to as legacy systems), or the "Beyond-the-Meter" infrastructure installed during conversion. The MHP Owner/Operator will hold harmless, defend and indemnify the Utility from all causes of action or claims arising from or related to these systems.
 - 7. Safety

The MHP Owner/Operator and its Contractor participating in the MHP Program recognize and agree that safety is of paramount importance in the performance of the MHP Program and are solely responsible for performing the "Beyond-the-Meter" work in a safe manner and in accordance with the National Electric Code, Universal Plumbing Code and the Safety Section of the MHP Agreement.

(Continued)



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 5

D. MHP PROGRAM COMPONENTS: (Cont'd)

(N)

8. Reimbursement to MHP Owner/Operator

PG&E will reimburse the MHP Owner/Operator for reasonable and prudently incurred expenses for "Beyond-the-Meter" construction covered by the MHP Program. This shall include reasonable costs for converting to direct PG&E service buildings/structures and/or locations that serve as common areas for the MHP's residents and which currently receive utility service from the MHP's master-metered natural gas system.

For common areas, consistent with existing requirements for PG&E to safely and efficiently connect its service facilities with its natural gas main pipeline facilities, PG&E will terminate its service facilities at a location as close as possible to the exterior of the building/structure nearest to the PG&E mainline facilities. Moreover, the selected location shall be as close as practicable to the existing service delivery point(s); however, some flexibility in the construction approach is necessary to address various situations that exist in current installations.

Beyond-the-Meter expenditures shall not include costs relating to any modification or retrofit of the Mobilehome, cost associated with service relocations, rearrangements, upgrades, or other service modification(s) by the MHP Owner/Operator and/or by the MHP residents beyond what is being provided by the MHP Program. For expenditures related to common areas, PG&E is not responsible for the installation, modification, and/or permitting of necessary MHP owned gas pipeline facilities, or other non-PG&E owned facilities necessary to accommodate gas riser installations. Moreover, PG&E is not responsible for any beyond-the-meter work necessary to connect the newly established service delivery points to existing delivery points whether such connections are external or internal to the building/structure. The amount eligible for reimbursement will be stated in the MHP Agreement.

9. Payment to PG&E

If applicable, any costs associated with service relocations, rearrangements and upgrades that are not covered by the MHP Program or in excess of what the MHP Program requires must be paid in full to PG&E prior to or included with the submittal of the MHP Agreement in order for the construction phase to begin.

10. Changes to the Mobilehome/Manufactured Home

Changes or modification to the individual mobilehome, including alteration to the utility connection that may be required to complete the conversion, must be authorized by the registered owner of the mobilehome prior to the alterations being made. Obtaining such authorization is the responsibility of the Mobilehome Owner/Operator. Authorization from a resident who is not also the registered owner is not sufficient.

(N)

(Continued)



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 6

E. INTERACTION WITH OTHER TARIFFS:

(N)

1. MHP Residents

Upon conversion, MHP residents will be subject to PG&E's effective Tariffs, which can be found at www.pge.com/tariffs, with the following exceptions:

- a. Gas Rules 7– Deposit: Existing MHP residents who become customers of PG&E through the MHP Program will be deemed “grandfathered” into their PG&E service accounts and on a one-time basis, fees associated with new customer credit checks and service deposits will be waived. This one-time waiver is authorized by D.14-03-021. MHP residents will still be subject to the service shut-off provisions under Gas Rules 11.
- b. CARE/FERA Program – Existing MHP residents who participate in the California Alternate Rates for Energy (CARE) and/or Family Electric Rate Assistance (FERA) programs through the MHP master-meter/submeter distribution system and become customers of PG&E through the MHP Program will be deemed “grandfathered” into the respective program without having to recertify or reapply as long as the name of the customer for the new service account matches that of the name of the participant in the CARE/FERA program. This will be a one-time exception to the respective CARE/FERA Rules at the time of the service conversion and will continue to be subject to the periodic recertification and/or post-enrollment verification requirements of the CARE/FERA program.
- c. Medical Baseline Allowance – Existing MHP residents who receive a medical baseline allowances through the MHP master-meter/submeter distribution system and become customers of PG&E through the MHP Program will be deemed “grandfathered” and will continue to receive the same medical baseline allowances without having to recertify or reapply as long as the participant who is receiving the medical baseline allowance still resides at the residence. This will be a one-time exception to the Medical Baseline Rules (Rule 19) at the time of the service conversion and will continue to be subject to the periodic recertification and/or post-enrollment verification requirements of the Medical Baseline Rule.

2. MHP Owner/Operator(s)

Utility service provided by PG&E to the MHP Owner/Operator(s) is subject to PG&E's effective Tariffs, which can be found at www.pge.com/tariffs, with the following exceptions:

- a. Gas Rules 15 – Distribution Extension: Because PG&E will design and install the new Distribution Line/Main Extension, at no cost to the MHP Owner/Operator, sections in Gas Rules 15 that cover applicant responsibilities or options are not applicable to MHP Owner/Operator while participating in the MHP Program. This may include, but is not limited to applicants': responsibilities; allowances; contributions or advances; refunds; and design and installation options.

(N)

(Continued)



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 7

- E. INTERACTION WITH OTHER TARIFFS: (Cont'd) (N)
2. MHP Owner/Operator(s) (Cont'd)
- b. Gas Rules 16 – Service Extension: Because PG&E will design and install the new Service Extension, at no cost to the MHP Owner/Operator, sections in Gas Rules 16 that cover applicant responsibilities or options are not applicable to MHP Owner/Operators while participating in the MHP Program. This may include, but is not limited to applicants': installation options, allowances and payment.
- Because space for metering equipment and its associated working space are very limited in MHPs, the requirements of the Meter Location provision of Gas Rule 16 may be waived by the utility during MHP Program participation. In consultation with the MHP Owner/Operator, all meters and associated metering equipment under the MHP Program shall be located at a protected location in the park as designated and approved by PG&E.
- F. DEFINITIONS and ACRONYMS:
- Certain specific terms used in this Rule are defined below. Additional definitions for more widely used terms in PG&E's tariffs are also found in Electric and Gas Rule 1
1. MHP AGREEMENT – The Mobilehome Park Utility Upgrade Agreement (Form 79-1165).
 2. BEYOND-THE-METER (Gas) – Gas "Beyond-the-Meter" facilities include the gas equipment to establish the Service Delivery Point as identified in the "Required Service Equipment" of Gas Rule 16, along with the infrastructure necessary to complete the extension of facilities from the new gas metering facility to the mobilehome exterior line stub The Utility will not be responsible for any part of the point of connection material, including labor, or any work that would require an alteration permit. Other than aspects related to reimbursement by utilities for the reasonable costs for their initial construction, Beyond-the-Meter facilities are the responsibility of the MHP Owner/Operator or the mobilehome owner. The mobilehome exterior line stub outlet will continue to be part of the mobilehome and be the responsibility of the MH Owner.
 3. COMMON USE AREA – Designated building(s), areas, or facilities within an MHP that is (are) intended to be used by all the park residents or the MHP Owner/Operator. Energy costs for servicing the common area are paid for by the MHP Owner/Operator.
 4. CPUC's FORM OF INTENT – The CPUC's Application for Conversion of Master-Meter Service at Mobilehome Park or Manufactured Housing Community to Direct Service from Electric or Gas Corporation (Appendix C of Decision 14-03-021).
 5. HCD – California Department of Housing and Community Development – HCD administers and enforces uniform statewide standards which assure owners, residents and users of mobilehome parks protection from risks to their health and safety.
- (N)

(Continued)



GAS RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 8

- | | |
|--|-----|
| F. DEFINITIONS and ACRONYMNS: (Cont'd) | (N) |
| 6. MANUFACTURED HOUSING COMMUNITY – Any area or tract of land where two or more manufactured home lots are rented or leased, held out for rent or lease, or were formerly held out for rent or lease and later converted to a subdivision, cooperative, condominium, or other form of resident ownership, only to accommodate the use of manufactured homes constructed pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974. | |
| 7. MOBILEHOME – See Rule 1. | |
| 8. MOBILEHOME PARK – See Rule 1. | |
| 9. MOBILEHOME SPACE (MH-Space) – Designated area within a Mobilehome Park that is owned, rented, or held out for rent, to accommodate a mobilehome used for human habitation. | |
| 10. MOBILEHOME PARK OWNER/OPERATOR (MHP Owner/Operator) – The party that has legal obligation for the MHP. | |
| 11. MHP RESIDENT – A person who has tenancy in a mobilehome park under a rental agreement or who lawfully occupies a mobilehome. | |
| 12. SED – California Public Utilities Commission’s Safety and Enforcement Division: The SED has safety oversight of electric and communications facilities, natural gas and propane gas systems, railroads, light rail transit systems, and highway/rail crossings, licensing, consumer protection, and safety oversight of motor carriers of passengers, household goods, and water vessels, and regulatory oversight of hot air balloons and some air carriers. | |
| 13. SERVICE DELIVERY POINT (Gas) – Where PG&E’s Service Facilities are connected to Applicant’s pipe (house line), normally adjacent to the location of the meter. | |
| 14. TO-THE-METER (Gas) – Gas “To-the-Meter” facilities include all gas facilities (e.g. connection fittings, pipe, valves, riser, regulator and meters) including substructures necessary to complete the gas distribution line and service extensions to the Service Delivery Point, and will be owned, maintained and operated by PG&E. | |
| 15. MHP APPLICATION – The joint Utilities’ Mobilehome Park Utility Upgrade Application (Form 79-1164). | (N) |



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page	31780*-G	(T)
Rate Schedules	31689,31678-G	
Preliminary Statements.....	31702,31697-G	
Rules	31781*-G	(T)
Maps, Contracts and Deviations.....	31544-G	
Sample Forms	30592,30323,30324,30325,31704,30439-G	

(Continued)

Advice Letter No: 3500-G-C
 Decision No. 14-03-021

Issued by
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 Regulatory Affairs

Date Filed December 22, 2014
 Effective _____
 Resolution No. _____



GAS TABLE OF CONTENTS

Sheet 6

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Rules		
Rule 01	Definitions.....	31083,26782,25123,18197,26823,26824,24120,18200, 22924,29263,29264,29265,29266,29267,29268,29269,29270-G
Rule 02	Description of Service.....	23062-23066,26825-G
Rule 03	Application for Service.....	27248,27249-G
Rule 04	Contracts.....	17051-G
Rule 05	Special Information Required on Forms.....	30088,13348-13349-G
Rule 06	Establishment and Reestablishment of Credit.....	22126,30687,31329-G
Rule 07	Deposits.....	31330,28655-G
Rule 08	Notices.....	31331,17580,30688,30689,15728-G
Rule 09	Rendering and Payment of Bills.....	24128,24129,27941,23518,31332, 27345,27346,28562-G
Rule 10	Disputed Bills.....	18214-18216-G
Rule 11	Discontinuance and Restoration of Service.....	31699,31333*,18219,18220,27251,23520, 18223,18224,18225,18226,18227,27252,31334,19710-G
Rule 12	Rates and Optional Rates.....	18229,27253,24132,21981-21982,24474-G
Rule 13	Temporary Service.....	22832-G
Rule 14	Capacity Allocation and Constraint of Natural Gas Service.....	18231-18235,30690-30698,28283, 30699-30702,29787,28289,28290,30703,28292-G
Rule 15	Gas Main Extensions.....	21543,18802-18803,31117,20350,29271,29272,26827,21544, 21545,22376,22377-22379,26828,26829,18814-G
Rule 16	Gas Service Extensions.....	21546,18816,17728,17161,18817,18818,18819,18820,18821, 18822,29273,18824,18825,17737,18826,18827-G
Rule 17	Meter Tests and Adjustment of Bills for Meter Error.....	14450,28656,28764,28770,28771, 28772,28773,28774-G
Rule 17.1	Adjustment of Bills for Billing Error.....	22936,28657,29274-G
Rule 17.2	Adjustment of Bills for Unauthorized Use.....	22937,14460,14461-G
Rule 18	Supply to Separate Premises and Submetering of Gas.....	22790,17796,13401-G
Rule 19	Medical Baseline Quantities.....	21119,21120,21121-G
Rule 19.1	California Alternate Rates for Energy for Individual Customers and Submetered Tenants of Master-Metered Customers.....	31214,31215,30445,28210-G
Rule 19.2	California Alternate Rates for Energy for Nonprofit Group-Living Facilities.....	24609,31216,17035,31217,30448-G
Rule 19.3	California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities.....	24138,31218,31219,27256-G
Rule 21	Transportation of Natural Gas.....	27591,29192,29193,23786,23194,23195,21845,23196, 23197,23198,23199,22086,22087,24444,24445,31564-31578-G
Rule 21.1	Use of Pacific Gas and Electric Company's Firm Interstate Rights.....	20461,18260,18261-G
Rule 23	Gas Aggregation Service for Core Transport Customers.....	29275,18263,26664,18265, 26665-26666,24825,24826,24827,24828,29276,29277,26667,24832-24833, 24849,29278,-29279,18272-G,29248,29249,29250,29251,29252,29253,29254, 29255,29256-G
Rule 25	Gas Services-Customer Creditworthiness and Payment Terms.....	28816-28828-G
Rule 26	Standards of Conduct and Procedures Related to Transactions with Intracompany Departments, Reports of Negotiated Transactions, and Complaint Procedures.....	18284,18285,18633,30704-G
Rule 27.1	Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data.....	31387-31391-G
Rule 28	Mobilehome Park Utility Upgrade Program.....	31772*,31773-31779-G (N)

(Continued)

Advice Letter No: 3500-G-C
 Decision No. 14-03-021

Issued by
Steven Malnight
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Date Filed December 22, 2014
 Effective August 29, 2014
 Resolution No. _____

Cal P.U.C.
Sheet No.

Title of Sheet

Cancelling Cal
P.U.C. Sheet No.

34627-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 1	
34628-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 2	
34629-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 3	
34630-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 4	
34631-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 5	
34632-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 6	
34633-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 7	
34634-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 8	
34635-E	ELECTRIC TABLE OF CONTENTS Sheet 1	34618-E
34636-E	ELECTRIC TABLE OF CONTENTS RULES Sheet 21	34339-E

**Cal P.U.C.
Sheet No. Title of Sheet**

**Cancelling Cal
P.U.C. Sheet No.**



ELECTRIC RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 1

- A. **PURPOSE:** Pursuant to the California Public Utilities Commission's (CPUC or Commission) Decision (D.)14-03-021, PG&E is offering the Mobilehome Park Utility Upgrade Program ("MHP Program") as a voluntary three-year living pilot program to convert approximately 10 percent of eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (MHP) spaces within PG&E's service territory. Subject to the requirements set forth in this Rule, all eligible submetered spaces (including both "To-the-Meter" and "Beyond-the-Meter"), and common use services within the entire MHP will be converted from master-metered electric distribution service to direct PG&E distribution and service (Distribution System). (N)
- B. **APPLICABILITY:** The MHP Program is available to all eligible MHPs within PG&E's service territory as defined in Section C. Within the eligible MHPs, the only eligible Mobilehome spaces are those permitted by the California Department of Housing and Community Development (HCD) or its designated agency. Recreational vehicle parks and spaces are not eligible for the MHP Program.
- C. **PROGRAM ELIGIBILITY:**
1. MHPs must meet all of the following criteria to be eligible for the MHP Program. Program eligibility does not guarantee acceptance into the program, nor does it guarantee conversion to direct service from PG&E.
 - a. Receives electricity through a utility owned master-meter, owns and operates the distribution system with at least a natural gas or electric associated submeters, and furnish electricity to residents. In cases where only one service is submetered the submetered service must be served by an Investor Owned Utility participating in the MHP Program.
 - b. Take electric service under one of the following rate schedules:
 - Electric Schedule ET
 - Electric Schedule ETL
 - c. Operate under a current and valid license from the governmental entity with relevant authority.
 - d. If operated on leased real property, the land lease agreement must continue for a minimum of 20 years from the time that the MHP Agreement is executed by PG&E.
 - e. Not be subject to an enforceable condemnation order and/or to a pending condemnation proceeding.

(Continued)

Advice Letter No: 4466-E-C
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 Resolution No. _____



ELECTRIC RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 2

- C. PROGRAM ELIGIBILITY: (Cont'd) (N)
2. MHP Owner/Operators who elect to participate in the MHP Program must comply with all general rules, rights and obligations as set forth in this Rule. In addition, MHP Program participants must complete and/or execute the following documents:
- The CPUC’s “Application for Conversion of Master Meter Service at Mobilehome Park or Manufactured Housing Community to Direct Service from Electric or Gas Corporation” [“CPUC’s Form of Intent”]; and
 - The “Mobilehome Park Utility Upgrade Program Application” [“MHP Application”] (Form 79-1164); and
 - The “Mobilehome Park Utility Upgrade Program Agreement” [“MHP Agreement”] (Form 79-1165).
- D. MHP PROGRAM COMPONENTS:
1. CPUC’s Form of Intent
- CPUC’s Form of Intent will be accepted January 1, 2015, through March 31, 2015 (90-day period). The MHP Owner/Operator must complete and submit the CPUC’s Form of Intent concurrently to both the Safety Enforcement Division (SED) of the CPUC and PG&E. CPUC’s Form of Intent received after the 90-day period will be placed on a waiting list.
- a. Prioritization of CPUC’s Form of Intent
- 1) CPUC’s Form of Intent will be reviewed and prioritized as follows: (1) SED will prioritize MHPs that are gas only or dual system (gas and electric service), and (2) the California Department of Housing and Community Development (HCD) will prioritize MHPs that are electric only. MHPs whose CPUC’s Form of Intent are accepted and prioritized by SED and HCD will be considered pre-qualified.
 - 2) PG&E will receive a list of pre-qualified MHP Initial Applications from SED and HCD. PG&E will then contact the MHPs with the highest priority to participate in the MHP program until the program goal is achieved. PG&E will undertake its best efforts to communicate and coordinate with other utilities, municipal entities, and/or water and telecommunications providers to maximize efficiencies where possible (N)

(Continued)



ELECTRIC RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 3

- D. MHP PROGRAM COMPONENTS: (Cont'd.) (N)
- 2. MHP Application
 - a. After an MHP has been preliminarily contacted by PG&E to participate in the MHP Program, the MHP Owner/Operator will be provided with the MHP Application. The MHP Application requests additional information that the MHP Owner/Operator should provide to enable PG&E to commence the engineering and planning process for the new MHP distribution system.
 - b. Upon receipt of a completed MHP Application and necessary documentation from the MHP Owner/Operator, PG&E will commence engineering and planning a new MHP distribution system.
 - 3. MHP Agreement
 - a. After PG&E has engineered and planned the new MHP distribution system and PG&E has received the name of the MHP's Contractor and the cost for the "Beyond-the-Meter" work, PG&E will prepare the MHP Agreement for signature.
 - b. The conversion project will commence upon 1) the satisfactory resolution of any environmental, endangered species and/or cultural issues, 2) procurement of all required permits, and 3) payment for any applicable re-arrangements/relocation of facilities or addition of new electric facilities "Beyond- the-Meter" by the MHP Owner/Operator, 4) the execution of the MHP Agreement.
 - 4. Construction
 - a. PG&E will perform or select a qualified, licensed contractor to perform all necessary "To-the-Meter" construction, and/or electric work as set forth in this Rule, and the MHP Agreement.
 - b. In common areas, consistent with existing requirements for PG&E to safely and efficiently connect its service facilities with its electric distribution facilities, PG&E will terminate its service facilities at a location as close as possible to the exterior of the building/structure nearest to PG&E's main distribution facilities. The selected location shall be as close as practicable to the existing service delivery point(s); however, some flexibility in the construction approach is necessary to address various situations that exist in current installations.
 - c. The MHP Owner/Operator selected Contractor will perform all necessary "Beyond-the-Meter" construction and/or electrical work as set forth in this Rule, and the MHP Agreement. (N)

(Continued)



ELECTRIC RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 4

- D. MHP PROGRAM COMPONENTS: (Cont'd.) (N)
- 5. Cutover of Service
 - a. Cutover to direct service from PG&E will occur only after the inspection and approval of the "Beyond-the-Meter" facilities by the appropriate jurisdictional authorities.
 - b. The MHP Owner/Operator's MHP master-meter submetered discount will continue in full and will only cease at complete cutover of the entire system to direct service from PG&E.
 - c. MHP residents (tenants or owners of the Mobilehome) will become customers of PG&E and served in accordance with all applicable rates, rules and conditions set forth in PG&E's existing Tariffs, except as otherwise noted in this Rule.
 - 6. Ownership of Facilities After Conversion
 - a. Upon cutover to direct service, PG&E will own, operate, and maintain all of the "To-the-Meter" electric distribution and service systems within the MHP in accordance with all applicable rates, rules and conditions set forth in PG&E existing Tariffs.
 - b. The MHP Owner/Operator or MH Owner shall own, operate and maintain all "Beyond-the-Meter" facilities in accordance with State and local jurisdictional codes and ordinances.
 - c. PG&E shall have no liability for the MHP submetered system (referred to as legacy systems), or the "Beyond-the-Meter" infrastructure installed during conversion. The MHP Owner/Operator will hold harmless, defend and indemnify the Utility from all causes of action or claims arising from or related to these systems.
 - 7. Safety

The MHP Owner/Operator and its Contractor participating in the MHP Program recognize and agree that safety is of paramount importance in the performance of the MHP Program and are solely responsible for performing the "Beyond-the-Meter" work in a safe manner and in accordance with the National Electric Code, Universal Plumbing Code and the Safety Section of the MHP Agreement.

(Continued)



ELECTRIC RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 5

D. MHP PROGRAM COMPONENTS: (Cont'd.)

(N)

8. Reimbursement to MHP Owner/Operator

PG&E will reimburse the MHP Owner/Operator for reasonable and prudently incurred expenses for "Beyond-the-Meter" construction covered by the MHP Program. This shall include reasonable costs for converting to direct PG&E service buildings/structures and/or locations that serve as common areas for the MHP's residents and which currently receive utility service from the MHP's master-metered system.

For common areas, consistent with existing requirements for PG&E to safely and efficiently connect its service facilities with its natural gas main pipeline facilities, PG&E will terminate its service facilities at a location as close as possible to the exterior of the building/structure nearest to the PG&E mainline facilities. Moreover, the selected location shall be as close as practicable to the existing service delivery point(s); however, some flexibility in the construction approach is necessary to address various situations that exist in current installations.

Beyond-the-Meter expenditures shall not include costs relating to any modification or retrofit of the Mobilehome, costs associated with service relocations, rearrangements, upgrades, or other service modification(s) by the MHP Owner/Operator and/or by the MHP residents beyond what is being provided by the MHP Program. For expenditures related to common areas, PG&E is not responsible for the installation, modification, and/or permitting of necessary MHP owned electric facilities, or other non-PG&E owned facilities necessary to accommodate electric installations. Moreover, PG&E is not responsible for any beyond-the-meter work necessary to connect the newly established service delivery points to existing delivery points whether such connections are external or internal to the building/structure. The amount eligible for reimbursement will be stated in the MHP Agreement.

9. Payment to PG&E

If applicable, any costs associated with service relocations, rearrangements and upgrades that are not covered by the MHP Program or in excess of what the MHP Program requires must be paid in full to PG&E prior to or included with the submittal of the MHP Agreement in order for the construction phase to begin.

10. Changes to the Mobilehome/Manufactured Home

Changes or modification to the individual mobilehome, including alternation to the utility connection that may be required to complete the conversion, must be authorized by the registered owner of the mobilehome prior to the alterations being made. Obtaining such authorization is the responsibility of the Mobilehome Owner/Operator. Authorization from a resident who is not also the registered owner is not sufficient.

(N)

(Continued)



ELECTRIC RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 6

E. INTERACTION WITH OTHER TARIFFS:

(N)

1. MHP Residents

Upon conversion, MHP residents will be subject to PG&E's effective Tariffs, which can be found at www.pge.com/tariffs, with the following exceptions:

- a. Electric Rules 7– Deposit: Existing MHP residents who become customers of PG&E through the MHP Program will be deemed “grandfathered” into their PG&E service accounts and on a one-time basis, fees associated with new customer credit checks and service deposits will be waived. This one-time waiver is authorized by D.14-03-021. MHP residents will still be subject to the service shut-off provisions under Electric Rules 11.
- b. CARE/FERA Program – Existing MHP residents who participate in the California Alternate Rates for Energy (CARE) and/or Family Electric Rate Assistance (FERA) programs through the MHP master-meter/submeter distribution system and become customers of PG&E through the MHP Program will be deemed “grandfathered” into the respective program without having to recertify or reapply as long as the name of the customer for the new service account matches that of the name of the participant in the CARE/FERA program. This will be a one-time exception to the respective CARE/FERA Rules at the time of the service conversion and will continue to be subject to the periodic recertification and/or post-enrollment verification requirements of the CARE/FERA program.
- c. Medical Baseline Allowance – Existing MHP residents who receive a medical baseline allowances through the MHP master-meter/submeter distribution system and become customers of PG&E through the MHP Program will be deemed “grandfathered” and will continue to receive the same medical baseline allowances without having to recertify or reapply as long as the participant who is receiving the medical baseline allowance still resides at the residence. This will be a one-time exception to the Medical Baseline Rules (Rule 19) at the time of the service conversion and will continue to be subject to the periodic recertification and/or post-enrollment verification requirements of the Medical Baseline Rule.

2. MHP Owner/Operator(s)

Utility service provided by PG&E to the MHP Owner/Operator(s) is subject to PG&E's effective Tariffs, which can be found at www.pge.com/tariffs, with the following exceptions:

- a. Electric Rules 15 – Distribution Extension: Because PG&E will design and install the new Distribution Line/Main Extension, at no cost to the MHP Owner/Operator, sections in Electric Rules 15 that cover applicant responsibilities or options are not applicable to MHP Owner/Operator while participating in the MHP Program. This may include, but is not limited to applicants': responsibilities; allowances; contributions or advances; refunds; and design and installation options.

(N)

(Continued)



ELECTRIC RULE NO. 28
MOBILEHOME PARK UTILITY UPGRADE PROGRAM

Sheet 7

E. INTERACTION WITH OTHER TARIFFS: (Cont'd)

(N)

2. MHP Owner/Operator(s) (Cont'd)

- b. Electric Rules 16 – Service Extension: Because PG&E will design and install the new Service Extension, at no cost to the MHP Owner/Operator, sections in Electric Rules 16 that cover applicant responsibilities or options are not applicable to MHP Owner/Operators while participating in the MHP Program. This may include, but is not limited to applicants': installation options, allowances and payment.

Because space for metering equipment and its associated working space are very limited in MHPs, the requirements of the Meter Location provision of Electric Rule 16 may be waived by the utility during MHP Program participation. In consultation with the MHP Owner/Operator, all meters and associated metering equipment under the MHP Program shall be located at a protected location in the park as designated and approved by PG&E.

F. DEFINITIONS and ACRONYMS:

Certain specific terms used in this Rule are defined below. Additional definitions for more widely used terms in PG&E's tariffs are also found in Electric and Gas Rule 1

1. MHP AGREEMENT – The Mobilehome Park Utility Upgrade Agreement (Form 79-1165).
2. BEYOND-THE METER (Electric) – Electric “Beyond-the-Meter” facilities include the electric equipment to establish the Service Delivery Point as identified in the “Required Service Equipment” of Electric Rule 16, along with additional conductors, infrastructure and substructures necessary to complete the extension of facilities from the Service Delivery Point (e.g. Electric Metering Facility to the point of connection (e.g. power supply cord or hard wire feeder assembly) for the mobile home. The Utility will not be responsible for any part of the “point of connection” as noted above, including labor, or any work that would require an alteration permit. Other than aspects related to reimbursement by utilities for the reasonable costs for their initial construction, Beyond-the-Meter facilities are solely the responsibility of the MHP Owner/Operator or the mobilehome owner (MH Owner). The power supply cord or hard wire feeder assembly will continue to be part of the mobilehome and be the responsibility of the mobilehome owner.
3. COMMON USE AREA – Designated building(s), areas, or facilities within an MHP that is (are) intended to be used by all the park residents or the MHP Owner/Operator. Energy costs for servicing the common area are paid for by the MHP Owner/Operator.
4. CPUC's FORM OF INTENT – The CPUC's Application for Conversion of Master-Meter Service at Mobilehome Park or Manufactured Housing Community to Direct Service from Electric or Gas Corporation (Appendix C of Decision 14-03-021).
5. HCD - California Department of Housing and Community Development –HCD administers and enforces uniform statewide standards which assure owners, residents and users of mobilehome parks protection from risks to their health and safety.

(N)

(Continued)



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
	Title Page	34635*-E	(T)
	Rate Schedules	34511,34559,34619,34620,34536,34621,32705,31541,34517-E	
	Preliminary Statements	34622,32706,30376,34343,34357,34358,34359,34606-E	
	Rules	34623,34624, 34636*-E	(T)
	Maps, Contracts and Deviations.....	34526-E	
	Sample Forms	32777,32429,32726,34625,32504,33654,33209,34626,34560*,32437,32508,32439-E	

(Continued)

Advice Letter No: 4466-E-C
 Decision No. 14-03-021

Issued by
Steven Malnight
 Senior Vice President
 Regulatory Affairs

Date Filed December 22, 2014
 Effective _____
 Resolution No. _____



**ELECTRIC TABLE OF CONTENTS
 RULES**

Sheet 21

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Rules (Cont'd)		
Rule 20	Replacement of Overhead with Underground Electric Facilities	30474,11240,11241,19013,16665,15611,19014-E
Rule 21	Generating Facility Interconnections	33943-34139-E
Rule 22	Direct Access Service	33491,29165-29171,14896,30872-30874,32992-32995,30879-30915,33492-33503-E
Rule 22.1	Direct Access Service Switching Exemption Rules	31145-31147,20999,31148,29178,29179,29464,29181,29182,29183,29465,29466,29186-29190-E
Rule 23	Standby Service	25527*-25528*,32810,25530*-25534*,30933,29202,25537*,25538*,29471,25540*-25544*,29472,27268,30934-30958,32811,30960-30962-E
Rule 23.2	Community Choice Aggregation Open Season.....	25575-25577,27270,27271-E
Rule 24	Direct Participation Demand Response	33694-33722-E
Rule 25	Release Of Customer Data To Third Parties	34333,34334,34335,34336,34337-E
Rule 27	Privacy and Security Protections for Energy Usage Data	32189-32205-E
Rule 28	Mobilehome Park Utility Upgrade Program.....	34627*,34628-34634-E (N)

(Continued)

Advice Letter No: 4466-E-C
 Decision No. 14-03-021

Issued by
Steven Malnight
 Senior Vice President
 Regulatory Affairs

Date Filed December 22, 2014
 Effective _____
 Resolution No. _____

**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

AT&T	Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.
Albion Power Company	Douglass & Liddell	OnGrid Solar
Alcantar & Kahl LLP	Downey & Brand	Pacific Gas and Electric Company
Anderson & Poole	Ellison Schneider & Harris LLP	Praxair
BART	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
Barkovich & Yap, Inc.	GenOn Energy Inc.	SCD Energy Solutions
Bartle Wells Associates	GenOn Energy, Inc.	SCE
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
California Cotton Ginners & Growers Assn	Green Power Institute	SPURR
California Energy Commission	Hanna & Morton	Seattle City Light
California Public Utilities Commission	In House Energy	Sempra Utilities
California State Association of Counties	International Power Technology	SoCalGas
Calpine	Intestate Gas Services, Inc.	Southern California Edison Company
Casner, Steve	K&L Gates LLP	Spark Energy
Cenergy Power	Kelly Group	Sun Light & Power
Center for Biological Diversity	Linde	Sunshine Design
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Tecogen, Inc.
City of San Jose	Los Angeles Dept of Water & Power	Tiger Natural Gas, Inc.
Clean Power	MRW & Associates	TransCanada
Coast Economic Consulting	Manatt Phelps Phillips	Utility Cost Management
Commercial Energy	Marin Energy Authority	Utility Power Solutions
Cool Earth Solar, Inc.	McKenna Long & Aldridge LLP	Utility Specialists
County of Tehama - Department of Public Works	McKenzie & Associates	Verizon
Crossborder Energy	Modesto Irrigation District	Water and Energy Consulting
Davis Wright Tremaine LLP	Morgan Stanley	Wellhead Electric Company
Day Carter Murphy	NLine Energy, Inc.	Western Manufactured Housing Communities Association (WMA)
Defense Energy Support Center	NRG Solar	YEP Energy
Dept of General Services	Nexant, Inc.	