
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 2, 2019

Advice Letter 4081-G and 5504-E

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

SUBJECT: Tariff Modifications to Reflect Resolution E-4958.

Dear Mr. Jacobson:

Advice Letter 4081-G and 5504-E are effective as of March 26, 2019.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

March 26, 2019

Advice 4081-G/5504-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Tariff Modifications to Reflect Resolution E-4958

Purpose

The purpose of this submittal is to modify Electric Preliminary Statement Part GH (Mobile Home Park Balancing Account – Electric), Gas Preliminary Statement Part DB (Mobile Home Park Balancing Account – Gas), Electric Rule No. 28 (Mobilehome Park Utility Upgrade Program), and Gas Rule No. 28 (Mobilehome Park Utility Upgrade Program) in accordance with California Public Utilities Commission (Commission or CPUC) Resolution E-4958, Ordering Paragraph (OP) 4.

Background

The Mobile Home Park Utility Upgrade Pilot Program (MHP Pilot) was established in Decision (D.) 14-03-021 in 2014 as a three-year pilot program (2015-2017) to convert mobilehome parks and manufactured housing communities (collectively, MHPs) to direct utility service.¹

On September 28, 2017, Resolution E-4878 authorized all currently participating electric and gas utilities to continue their MHP Pilots until the earlier date of either December 31, 2019, or the issuance of a Commission Decision for the continuation, expansion or modification of the program beyond December 31, 2019.

On May 7, 2018, the Commission approved Order Instituting Rulemaking (OIR) R.18-04-018 to Evaluate the Mobilehome Park Pilot Program and to Adopt Programmatic Modifications. Resolution E-4958, issued March 18, 2019, extends the MHP Pilot

¹ Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), PacifiCorp, Golden State Water Company (DBA Bear Valley Electric Service), Liberty Utilities, Southern California Gas Company (SoCalGas), and Southwest Gas Corporation (Southwest Gas) participated in the MHP Pilot program.

Program to December 31, 2021, to afford the Commission time to update and refine MHP cost forecasts and actual costs and safety data. This will allow the Commission to fully evaluate the MHP Pilot Program and consider a more permanent program in R.18-04-018.

Tariff Revisions

PG&E is revising its Electric Preliminary Statement Part GH (Mobile Home Park Balancing Account – Electric), Gas Preliminary Statement DB (Mobile Home Park Balancing Account – Gas), Electric Rule No. 28 (Mobilehome Park Utility Upgrade Program) and Gas Rule No. 28 (Mobilehome Park Utility Upgrade Program) to reflect the continuation of the MHP Program through the earlier date of December 31, 2021, or the issuance of a Commission decision for the continuation, expansion, or modification of the program, and to comply with the limitations in OP 2 of Resolution E-4958.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than April 15, 2019, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to OP 4 of Resolution E-4958, this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1, Effective Pending Disposition, pursuant to General Order (GO) 96-B. PG&E respectfully requests this Advice Letter be effective March 26, 2019, which is the date submitted.

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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.18-04-018
David Lee, Energy Division
Fred Hanes, Safety and Enforcement Division



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4081-G/5504-E

Tier Designation: 1

Subject of AL: Tariff Modifications to Reflect Resolution E-4958

Keywords (choose from CPUC listing): Rules, Tariffs, Compliance,

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-4958

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:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 3/26/19

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: Please see attachment 1

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
34937-G	GAS PRELIMINARY STATEMENT PART DB MOBILE HOME PARK BALANCING ACCOUNT - GAS Sheet 1	33771-G
34938-G	GAS RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 1	33773-G
34939-G	GAS TABLE OF CONTENTS Sheet 1	34880-G
34940-G	GAS TABLE OF CONTENTS Sheet 5	34789-G
34941-G	GAS TABLE OF CONTENTS Sheet 7	34528-G



GAS PRELIMINARY STATEMENT PART DB
MOBILE HOME PARK BALANCING ACCOUNT - GAS

Sheet 1

DB. MOBILE HOME PARK BALANCING ACCOUNT - GAS (MHPBA-G)

1. **PURPOSE:** The purpose of the Mobile Home Park Balancing Account - Gas (MHPBA-G) is to record and recover the actual incurred costs of implementing the voluntary program to convert the gas master-meter/submeter service at mobile home parks and manufactured housing communities to direct service by PG&E, pursuant to Decision (D.) 14-03-021. The costs associated with the accounting entries in the MHPBA-G shall include incremental incurred expenses and both "to the meter" and "beyond the meter" costs. Pursuant to Ordering Paragraph (OP) 8, the incurred expenses shall be entered into program balancing account for recovery in the first year following cut over of service subject to reasonableness review. Actual construction costs for each MHP conversion shall be entered into a balancing account and recovered in the year immediately following service cut over for that MHP. Reasonableness review for "to the meter" cost will occur in PG&E's General Rate Case (GRC) proceedings, where these costs are included into the base rates. The review of the "beyond the meter" costs will occur in the first GRC after service cut over. This account will remain open and continue to record the ongoing MHP conversion costs and associated revenue requirements related to all completed projects until those projects are included in a GRC revenue requirement. Pursuant to OP 1 of Resolution E-4958, PG&E shall continue its MHP Utility Upgrade Pilot Program until the earlier date of either December 31, 2021, or the issuance of a Commission Decision for the continuation, expansion or modification of the program beyond December 31, 2020 in Rulemaking R.18-04-018, subject to the limitations in Ordering Paragraph 2 of Res. E-4958.
2. **APPLICABILITY:** The MHPBA-G shall apply to all customer classes, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balances in the MHPBA-G account shall be determined in the Annual Gas True-Up (AGT) advice filings, or as otherwise authorized by the Commission, through the Core Fixed Cost Account (CFCA) and Noncore Customer Class Charge Account (NCA) or other venues approved by the Commission.
4. **RATES:** The MHPBA-G does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the MHPBA-G by making entries to this account at the end of each month as follows:
 - a) A debit entry equal to the incremental incurred expenses;
 - b) A debit entry equal to the capital-related revenue requirement, excluding Revenue Fees and Uncollectible (RF&U) accounts expense, related to the "to-the meter" capital costs incurred. Capital-related revenue requirements include depreciation expense, the return on investment at a rate equivalent to PG&E's current authorized return on rate base, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c) A debit entry equal to the revenue requirement, excluding RF&U, related to the "beyond-the meter" costs incurred. The revenue requirement will include amortization expense, return on investment, and federal and state income taxes, associated with the costs of installed equipment. The "beyond the meter" costs are recorded as a regulatory asset and will be amortized over ten years, with a return on investment at a rate equivalent to PG&E's current authorized return on rate base;

(N)
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(N)



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, Resolution E-4878, and Resolution E-4958, PG&E is offering the Mobilehome Park Utility Upgrade Program (“MHP Program”) as a voluntary living pilot program to convert eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (MHP) spaces within PG&E’s service territory. The MHP Program will conclude the earlier date of December 31, 2021 or the issuance of a Commission Decision for the continuation, expansion or modification of the program. Subject to the requirements set forth in this Rule and the program extension limitations set forth in Ordering Paragraph 2 of Resolution E-4958, 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)
 - (N)
 - (N)
 - (N)
 - (D)
 - (D)

- 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 sub-meters, 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.

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Advice 4081-G
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

March 26, 2019
March 26, 2019



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(T)

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(T)

Maps, Contracts and Deviations

SERVICE AREA MAPS:

Gas Service Area Map 31641-G

LIST OF CONTRACTS AND DEVIATIONS:

..... 20211,13247,13248,28466,17112,22437,29938,31542,13254,14426,13808,29284,
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Advice 4081-G
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Date Filed
Effective
Resolution

March 26, 2019
March 26, 2019

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
44013-E	ELECTRIC PRELIMINARY STATEMENT PART GH MOBILE HOME PARK BALANCING ACCOUNT - ELECTRIC Sheet 1	41091-E
44014-E	ELECTRIC RULE NO. 28 MOBILEHOME PARK UTILITY UPGRADE PROGRAM Sheet 1	41093-E
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ELECTRIC PRELIMINARY STATEMENT PART GH
MOBILE HOME PARK BALANCING ACCOUNT - ELECTRIC

Sheet 1

GH. MOBILE HOME PARK BALANCING ACCOUNT - ELECTRIC (MHPBA-E)

1. **PURPOSE:** The purpose of the Mobile Home Park Balancing Account - Electric (MHPBA-E) is to record and recover the actual incurred costs of implementing the voluntary program to convert the electric master-meter/submeter service at mobile home parks and manufactured housing communities to direct service by PG&E, pursuant to Decision (D.) 14-03-021. The costs associated with the accounting entries in the MHPBA-E shall include incremental incurred expenses and both "to the meter" and "beyond the meter" costs. Pursuant to Ordering Paragraph (OP) 8, the incurred expenses shall be entered into program balancing account for recovery in the first year following cut over of service subject to reasonableness review. Actual construction costs for each MHP conversion shall be entered into a balancing account and recovered in the year immediately following service cut over for that MHP. Reasonableness review of "to the meter" cost will occur in PG&E's General Rate Case (GRC) proceedings, where these costs are included into the base rates. The review of the "beyond the meter" costs will occur in the first GRC after service cut over. This account will remain open and continue to record the ongoing MHP conversion costs and associated revenue requirements related to all completed projects until those projects are included in a GRC revenue requirement. Pursuant to OP 1 of Resolution E-4958, PG&E shall continue its MHP Utility Upgrade Pilot Program until the earlier date of either December 31, 2021, or the issuance of a Commission Decision for the continuation, expansion or modification of the program beyond December 31, 2020 in Rulemaking R.18-04-018, subject to the limitations in Ordering Paragraph 2 of Res. E-4958.
2. **APPLICABILITY:** The MHPBA-E shall apply to all customer classes, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balances in this account shall be determined in the Annual Electric True-Up (AET), through the Distribution Revenue Adjustment Mechanism (DRAM), or as otherwise authorized by the Commission.
4. **RATES:** The MHPBA-E does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the MHPBA-E by making entries to this account at the end of each month as follows:
 - a) A debit entry equal to the incremental incurred expenses;
 - b) A debit entry equal to the capital-related revenue requirement, excluding Revenue Fees and Uncollectible (RF&U) accounts expense, related to the "to-the meter" capital costs incurred. Capital-related revenue requirements include depreciation expense, the return on investment at a rate equivalent to PG&E's current authorized return on rate base, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c) A debit entry equal to the revenue requirement, excluding RF&U, related to the "beyond-the meter" costs incurred. The revenue requirement will include amortization expense, return on investment, and federal and state income taxes, associated with the costs of installed equipment. The "beyond the meter" costs are recorded as a regulatory asset and will be amortized over ten years, with a return on investment at a rate equivalent to PG&E's current authorized return on rate base;
 - d) A debit or credit entry to transfer the balance to or from any other accounts as approved by the Commission; and

(N)
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(N)



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, Resolution E-4878, and Resolution E-4958. PG&E is offering the Mobilehome Park Utility Upgrade Program (“MHP Program”) as a voluntary living pilot program to convert eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (MHP) spaces within PG&E’s service territory. The MHP Program will conclude the earlier date of December 31, 2021 or the issuance of a Commission Decision for the continuation, expansion or modification of the program. Subject to the requirements set forth in this Rule and the program extension limitations set forth in Ordering Paragraph 2 of Resolution E-4958, 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)
(N)
(N)
(N)
(D)
(D)
- 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 sub-meters, 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.

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Advice 5504-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

March 26, 2019



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Sheet 17

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Advice 4081-G/5504-E
March 26, 2019

Attachment 2
Redlined Tariffs

GAS PRELIMINARY STATEMENT PART DB
MOBILE HOME PARK BALANCING ACCOUNT - GAS

Sheet 2

DB. MOBILE HOME PARK BALANCING ACCOUNT - GAS (MHPBA-G) (Cont'd.)

- 5. ACCOUNTING PROCEDURE: PG&E shall maintain the MHPBA-G by making entries to this account at the end of each month as follows: (Cont'd.) (L)
 - d) A debit or credit entry to transfer the balance to or from any other accounts as approved by the Commission; and
 - e) An entry equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries at a rate equal to one-twelfth the interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (L)

(Continued)

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 ~~and~~, Resolution E-4878, and Resolution E-4958, PG&E is offering the Mobilehome Park Utility Upgrade Program (“MHP Program”) as a voluntary living pilot program to convert eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (MHP) spaces within PG&E’s service territory. The MHP Program will conclude the earlier date of December 31, ~~2019~~ 2021 or the issuance of a Commission Decision for the continuation, expansion or modification of the program. Subject to the requirements set forth in this Rule and the program extension limitations set forth in Ordering Paragraph 2 of Resolution E-4958, 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). ~~However, PG&E will not begin construction of a MHP if before the start of the construction the facts indicate the conversion project will not be completed by October 31, 2019.~~ (N)
 (N)
 (N)
 (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 sub-meters, 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.

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART GH
MOBILE HOME PARK BALANCING ACCOUNT - ELECTRIC

Sheet 1

GH. MOBILE HOME PARK BALANCING ACCOUNT - ELECTRIC (MHPBA-E)

1. **PURPOSE:** The purpose of the Mobile Home Park Balancing Account - Electric (MHPBA-E) is to record and recover the actual incurred costs of implementing the voluntary program to convert the electric master-meter/submeter service at mobile home parks and manufactured housing communities to direct service by PG&E, pursuant to Decision (D.) 14-03-021. The costs associated with the accounting entries in the MHPBA-E shall include incremental incurred expenses and both "to the meter" and "beyond the meter" costs. Pursuant to Ordering Paragraph (OP) 8, the incurred expenses shall be entered into program balancing account for recovery in the first year following cut over of service subject to reasonableness review. Actual construction costs for each MHP conversion shall be entered into a balancing account and recovered in the year immediately following service cut over for that MHP. Reasonableness review of "to the meter" cost will occur in PG&E's General Rate Case (GRC) proceedings, where these costs are included into the base rates. The review of the "beyond the meter" costs will occur in the first GRC after service cut over. This account will remain open and continue to record the ongoing MHP conversion costs and associated revenue requirements related to all completed projects until those projects are included in a GRC revenue requirement. Pursuant to OP 17 of Resolution E-48784958, PG&E shall continue its MHP Utility Upgrade Pilot Program until the earlier date of either December 31, 2021, or the issuance of a Commission Decision for the continuation, expansion or modification of the program beyond December 31, 2020 in Rulemaking R.18-04-018, subject to the limitations in Ordering Paragraph 2 of Res. E-4958. MHP conversions will continue and be completed for up to the specified amount of MHP projects specified in Advice 3822-G/5033-E until the earlier date of December 31, 2019 or the issuance of a Commission Decision for the continuation, expansion or modification of the program. Note that a project should not be started if it is not expected to be completed by October 31, 2019

(N)
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(N)

2. **APPLICABILITY:** The MHPBA-E shall apply to all customer classes, except for those schedules or contracts specifically excluded by the Commission.

3. **REVISION DATE:** Disposition of the balances in this account shall be determined in the Annual Electric True-Up (AET), through the Distribution Revenue Adjustment Mechanism (DRAM), or as otherwise authorized by the Commission.

4. **RATES:** The MHPBA-E does not have a rate component.

5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the MHPBA-E by making entries to this account at the end of each month as follows:

- a) A debit entry equal to the incremental incurred expenses;
- b) A debit entry equal to the capital-related revenue requirement, excluding Revenue Fees and Uncollectible (RF&U) accounts expense, related to the "to-the meter" capital costs incurred. Capital-related revenue requirements include depreciation expense, the return on investment at a rate equivalent to PG&E's current authorized return on rate base, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- c) A debit entry equal to the revenue requirement, excluding RF&U, related to the "beyond-the meter" costs incurred. The revenue requirement will include amortization expense, return on investment, and federal and state income taxes, associated with the costs of installed equipment. The "beyond the meter" costs are recorded as a regulatory asset and will be amortized over ten years, with a return on investment at a rate equivalent to PG&E's current authorized return on rate base;
- d) A debit or credit entry to transfer the balance to or from any other accounts as

(L)

ELECTRIC PRELIMINARY STATEMENT PART GH
MOBILE HOME PARK BALANCING ACCOUNT - ELECTRIC

Sheet 1

approved by the Commission; and

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 ~~and~~, Resolution E-4878, and Resolution E-4958, PG&E is offering the Mobilehome Park Utility Upgrade Program (“MHP Program”) as a voluntary living pilot program to convert eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (MHP) spaces within PG&E’s service territory. The MHP Program will conclude the earlier date of December 31, ~~2019~~ 2021 or the issuance of a Commission Decision for the continuation, expansion or modification of the program. Subject to the requirements set forth in this Rule and the program extension limitations set forth in Ordering Paragraph 2 of Resolution E-4958, 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). ~~However, PG&E will not begin construction of a MHP if before the start of the construction the facts indicate the conversion project will not be completed by October 31, 2019.~~
- (N)
(N)
I
(N)
(N)
I
(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 sub-meters, 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)

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
	Energy Management Service	SCD Energy Solutions
Alta Power Group, LLC	Evaluation + Strategy for Social	
Anderson & Poole	Innovation	
	GenOn Energy, Inc.	SCE
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz &	SDG&E and SoCalGas
BART	Ritchie	
	Green Charge Networks	SPURR
Barkovich & Yap, Inc.	Green Power Institute	San Francisco Water Power and Sewer
P.C. CalCom Solar	Hanna & Morton	Seattle City Light
California Cotton Ginners & Growers Assn	ICF	Sempra Utilities
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
	Keyes & Fox LLP	Sunshine Design
Cameron-Daniel, P.C.	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Casner, Steve	Linde	TerraVerde Renewable Partners
Cenergy Power	Los Angeles County Integrated Waste	Tiger Natural Gas, Inc.
Center for Biological Diversity	Management Task Force	
City of Palo Alto	Los Angeles Dept of Water & Power	TransCanada
	MRW & Associates	Troutman Sanders LLP
City of San Jose	Manatt Phelps Phillips	Utility Cost Management
Clean Power Research	Marin Energy Authority	Utility Power Solutions
Coast Economic Consulting	McKenzie & Associates	Utility Specialists
Commercial Energy		
County of Tehama - Department of Public	Modesto Irrigation District	Verizon
Works	Morgan Stanley	Water and Energy Consulting
Crossborder Energy	NLine Energy, Inc.	Wellhead Electric Company
Crown Road Energy, LLC	NRG Solar	Western Manufactured Housing
Davis Wright Tremaine LLP		Communities Association (WMA)
Day Carter Murphy	Office of Ratepayer Advocates	Yep Energy
	OnGrid Solar	
Dept of General Services	Pacific Gas and Electric Company	
Don Pickett & Associates, Inc.		
Douglass & Liddell		