

**CALIFORNIA PUBLIC UTILITIES COMMISSION**

**ADVICE LETTER FILING SUMMARY  
ENERGY UTILITY**

**MUST BE COMPLETED BY LSE (Attach additional pages as needed)**

Company name/CPUC Utility No. **Liberty Utilities (CalPeco Electric) LLC (U 933-E)**

Utility type:

- ELC       GAS  
 PLC       HEAT       WATER

Contact Person for questions and approval letters: Dan Marsh

Phone #: (562) 299-5104

E-mail: Dan.Marsh@libertyutilities.com

**EXPLANATION OF UTILITY TYPE**

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 84-E

Subject of AL: Changes to Mobile Home Park Conversion Program Tariff

Tier Designation:  1    2    3

Keywords (choose from CPUC listing):

AL filing type:  Monthly    Quarterly    Annual    One-Time    Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: Resolution E-4878

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL

Summarize differences between the AL and the prior withdrawn or rejected AL:

Resolution Required?  Yes    No

Requested effective date: November 3, 2017

No. of tariff sheets: 2

Estimated system annual revenue effect (%): \_\_\_\_

Estimated system average rate effect (%): \_\_\_\_

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: Rule 23 – Tariff Sheets 407 and 408

Service affected and changes proposed: N/A

Pending Advice Letters that revise the same tariff sheets: N/A

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

**CPUC, Energy Division Utility Info (including e-mail)**

**Attention: Tariff Unit**  
**505 Van Ness Ave.,**  
**San Francisco, CA 94102**  
[edtarriffunit@cpuc.ca.gov](mailto:edtarriffunit@cpuc.ca.gov)

**Liberty Utilities (CalPeco Electric) LLC**  
**Attention: Advice Letter Protests**  
**933 Eloise Avenue**  
**South Lake Tahoe, CA 96150**  
**Email: Dan.Marsh@libertyutilities.com**



Liberty Utilities (CalPeco Electric) LLC  
933 Eloise Avenue  
South Lake Tahoe, CA 96150  
Tel: 800-782-2506  
Fax: 530-544-4811

November 3, 2017

**Advice Letter No. 84-E  
(U 933-E)**

California Public Utilities Commission  
Energy Division, Tariff Unit  
505 Van Ness Avenue, 4th Floor  
San Francisco, CA 94102-3298

**Subject: Mobile Home Park Tariff Changes in Compliance with Resolution E-4878**

In compliance with California Public Utilities Commission (CPUC) Resolution E-4878 Ordering Paragraph (OP) 9, Liberty Utilities (CalPeco Electric) LLC (Liberty CalPeco) hereby submits for filing the following changes to its tariffs. The revised tariff sheets are listed on Attachment A and are attached hereto.

**Purpose**

In compliance with OP 9 of Resolution E-4878, the purpose of this advice letter is to make changes to the tariffs originally submitted in AL-36-E and AL-37-E necessary to comply with Resolution E-4878. Specifically, Liberty CalPeco is revising its Rule 23, *Mobile Home Park Conversion Program*, to reflect the continuation of the program through 2019 and additional changes to the program based on Resolution E-4878.

**Background**

On April 18, 2017, Liberty CalPeco filed AL-76-E, pursuant to OP 13 of D.14-03-021, to request approval to continue the MHP Conversion Program through 2021 to convert the remaining 526 mobile home park spaces in its service territory.

On June 21, 2017, The Utility Reform Network (TURN) filed an amended protest recommending the CPUC reject Liberty CalPeco's advice letter with prejudice and require Liberty CalPeco to submit a formal application.

On September 29, 2017, the CPUC issued Resolution E-4878, which allowed Liberty CalPeco to continue the MHP Conversion Program. OP 7 of Resolution E-4878 allows Liberty CalPeco to complete all Category 1 MHP conversions and work on Category 2 and 3 MHPs until the earlier date of December 31, 2019 or the issuance of a Commission Decision for the continuation, expansion or modification of the program. The number of spaces converted in years 2018 and 2019 cannot exceed the levels specified in the utility's respective advice letter filing. In AL-76-E, Liberty CalPeco requested approval to convert all Tier 2 MHPs (two parks with 91 total spaces) in 2018 and to begin converting Tier 3 MHPs in 2019.

### **Proposed Tariff Changes**

Liberty CalPeco is modifying Rule 23, *Mobile Home Park Conversion Program*, to remove the original references to the three-year living pilot program and the 10 percent limit on conversions to reflect changes consistent with Resolution E-4878. Specifically, Liberty CalPeco is modifying Rule 23 to reflect that the program will continue through 2019 and that Liberty CalPeco will convert additional MHP spaces. Liberty CalPeco is also removing the language about the 90 day period for mobile home parks to participate in the program. Lastly, Liberty CalPeco is also making some minor, non-substantive edits due to typographical errors found in the tariff.

### **Tier Designation**

Pursuant to OP 9 of Resolution E-4878, this Advice Letter is submitted with a Tier 1 designation.

### **Effective Date**

This advice filing will become effective the same day filed, November 3, 2017.

### **Protests**

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or by email, any of which must be received no later than 20 days after the date of this Advice Letter. There are no restrictions on who may submit a protest, but the protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. Protests should be mailed to:

California Public Utilities Commission  
Energy Division, Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102-3298  
Facsimile: (415) 703-2200  
Email: [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

The protest should be sent via email and U.S. Mail (and by facsimile, if possible) to Liberty Utilities (CalPeco Electric) LLC at the address shown below on the same date it is mailed or delivered to the Commission:

Liberty Utilities (CalPeco Electric) LLC  
Attn: Advice Letter Protests  
933 Eloise Avenue  
South Lake Tahoe, CA 96150  
Fax: 530-544-4811  
Email: [Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com)

### **Notice**

Energy Division Tariff Unit  
California Public Utilities Commission  
November 3, 2017  
Page 3

In accordance with General Order 96-B, Section 4.3, a copy of this Advice Letter is being sent electronically to parties shown on the attached GO-96-B and R.11-02-018 service lists. Address change requests to the GO-96-B service list should be directed by electronic mail to [Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com). For changes to all other service lists, please contact the CPUC's Process Office at (415)702-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

For questions, please contact Daniel W. Marsh at (562)299-5104 or by electronic mail at [Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com)

Respectfully submitted,

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

/s/Daniel W. Marsh

Daniel W. Marsh  
Manager, Rates and Regulatory Affairs  
Liberty Utilities (CalPeco Electric) LLC

Attachments

cc: Liberty CalPeco General Order 96-B Service List  
Service List of R.11-02-018

## Attachment A

Liberty CalPeco Tariff Sheet Nos. 407 and 408

**ELECTRIC RULE 23**

**MOBILE HOME PARK CONVERSION PROGRAM**

- A. PURPOSE: Pursuant to the California Public Utility Commission's (CPUC or Commission) Decision (D.)14-03-021, Liberty Utilities is offering the Mobile Home Park Conversion Program (MHP Program) as a voluntary living pilot program to convert eligible master-metered submetered Mobile Home Parks or Manufactured Housing Communities (MHP) spaces within Liberty Utilities' service territory. Based on Commission Resolution E-4878, the MHP Program will continue until December 31, 2019. 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 Liberty Utilities distribution and service (Distribution System).
- B. APPLICABILITY: The MHP Program is available to all eligible MHPs within Liberty Utilities' service territory as defined in Section C. 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 Liberty Utilities.
    - a. Receive electricity through a single master-meter, own and operate the distribution system with associated sub-meters, and furnish electricity to residents.
    - b. Take electric service under one of the following rate schedules:
      - Electric Schedule D-1
      - Electric Schedule DM-1
    - 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.
    - e. Not be subject to an enforceable condemnation order and/or to a pending condemnation proceeding.

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Advice Letter No. 84-E

Issued by  
Gregory S. Sorensen

Date Filed November 3, 2017

Decision No. 14-03-021

Name  
President  
Title

Effective November 3, 2017

Resolution No. E-4878

(N)

**ELECTRIC RULE 23**

**MOBILEHOME PARK CONVERSION PROGRAM**

(Continued)

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 Conversion Program Application” [“Utilities’ MHP Application”] (Form 14-0700); and
- The “Mobilehome Park Conversion Program Agreement” [“MHP Agreement”] (Form 14-0710).

**D. MHP PROGRAM COMPONENTS**

1. CPUC’s Form of Intent

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 Liberty Utilities.

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 Initial Applications are accepted and prioritized by SED and HCD will be considered pre-qualified.
- 2) Liberty Utilities will receive a list of pre-qualified MHP Initial Applications from SED and HCD. Liberty Utilities will then contact the MHPs with the highest priority to participate in the MHP program until the program goal is achieved. Liberty Utilities 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.

(Continued)

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Advice Letter No. 84-E

Issued by  
Gregory S. Sorensen  
Name

Date Filed November 3, 2017

Decision No. 14-03-021

President  
Title

Effective November 3, 2017

Resolution No. E-4878

Liberty Utilities (CalPeco Electric) LLC  
Advice Letter Filing Service List  
General Order 96-B, Section 4.3

**VIA EMAIL**

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# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Service Lists

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**PROCEEDING: R1102018 - CPUC - OIR INTO TRAN**  
**FILER: CPUC**  
**LIST NAME: LIST**  
**LAST CHANGED: OCTOBER 6, 2015**

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