

February 1, 2023

***VIA ELECTRONIC FILING***

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California Public Utilities Commission  
505 Van Ness Avenue, Room 5<sup>th</sup> Floor  
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**RE: PacifiCorp (U 901-E) Annual Report on the Mobile Home Park Utility Upgrade Program**

In accordance with California Public Utilities Commission Decision 20-04-004, Ordering Paragraph 10, PacifiCorp submits its annual report on the program to convert master-metered mobile home parks (MHP) to direct utility service.

November of 2021, in preparation for 2022, contact was made with two parks from the California Public Utilities Commission (CPUC) list. Neither mobile home park qualified for the conversion under Rule 26. A visit was made on June 17, 2022, to another mobile home park on the CPUC list, and it also did not meet the qualifications for a Rule 26 conversion. PacifiCorp did not have a mobile home park conversion in 2022.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to the following:

By Email (**preferred**): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Pooja Kishore, Regulatory Manager, at (503) 813-7314.

Sincerely,



Matthew McVee  
Vice President, Regulatory Policy and Operations

California Public Utilities Commission

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Enclosure

cc: Leslie Palmer, Safety and Enforcement Division [Leslie.palmer@cpuc.ca.gov](mailto:Leslie.palmer@cpuc.ca.gov)  
R.18-04-018 Service List

Annual Report Template*		Report for calendar year: 2022		Per-year costs; not cumulative							
Descriptor		2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
<b>Program Participation</b>											
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion	-	-								
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	-	-								
Disadvantaged Community (none in Serv Territory)	Number of converted spaces within geographic zones defined by SB 535 map.	-	-								
Rural Community**	Number of converted spaces within rural community	-	-								
Urban Community**	Number of converted spaces within urban community	-	-								
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	-	-								
<b>Completed Spaces</b>	Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.										
Number of TTM MH and Covered Common Area Locations Converted (Electric)		-	-								
Number of BTM MH Converted Register Spaces (Electric)		-	-								
<b>Cost Information</b>											
<b>To-The-Meter (TTM) - Capital Costs</b>											
<b>Construction Direct Costs</b>											
Civil/Trenching	To the Meter Construction costs for civil related activities	-	-								
Electric		-	-								
<b>Electric System</b>											
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	-	-								
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	-	-								
Design/Construction Management	Cost for engineering, design and construction inspection cost	-	-								
<b>Other</b>											
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations	-	-								
Other Labor (Internal)***		-	-								
Non-Labor	Permits	-	-								
Materials	meters, modules and regulators	-	-								
<b>Program - Capital Costs</b>	Costs that are inconsistent among the other IOUs, driven by utility specific business models or cost accounting practices. These costs should be separated out so that others do not compare costs that are not comparable with others.	-	-								
<b>Project Management Costs</b>											
Project Management Office (PMO)	Program management office costs (Project Management, Program Management, schedulers, cost analysts and field engineers)	-	-								
<b>Outreach</b>											
Property Tax	Property tax on capital spending not yet put into service	-	-								

AFUDC	AFUDC is a mechanism in which the utility is allowed to recover the financing cost of it's construction activities. AFUDC starts when the first dollar is recorded on the project and ends when HCD complete the first inspection so that the new assets are in use by the residents.	-	-											
<b>Other</b>														
Labor (Internal)***		-	-											
Non-Labor	Utility specific overhead driven by corporate cost model	-	-											
<b>Subtotal: To-The-Meter (TTM) - Capital Cost</b>		<b>0</b>	<b>0</b>											
<b>To-The-Meter (TTM) - Expense Costs</b>														
<b>Project Management Costs</b>														
Project Management Office (PMO)	Program startup cost	-	-											
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	-	-											
<b>Other</b>														
Labor (Internal)	Program startup cost for supporting organizations	-	-											
Other Labor (Internal)***		-	-											
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	-	-											
<b>Subtotal: To-The-Meter (TTM) - Expense Cost</b>		<b>0</b>	<b>0</b>											
<b>Beyond-The-Meter (BTM)- Capital Costs</b>														
		Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and IOU to reimburse per D.14-02-021												
Civil/Trenching	NA	-	-											
<b>Electric System</b>														
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	-	-											
Material / Structures		-	-											
<b>Other</b>														
Other Labor (Internal)***	BTM Permits, including HCD fees	-	-											
<b>Subtotal: Beyond-The-Meter (BTM) - Capital Costs</b>		<b>0</b>	<b>0</b>											
<b>Total: TTM &amp; BTM Costs</b>		<b>0</b>	<b>0</b>											

Rate Impact and Revenue Requirement											
Rate Impact	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	
<b>Electric</b>											
Average Rate w/o MMBA <sup>1</sup> recovery - Total System	-	-									
Average Rate w/ MMBA recovery - Total System	-	-									
Rate change - Total System	-	-									
% Rate change - Total System	-	-									
<b>Revenue Requirement</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>	<b>2029</b>	<b>2030</b>	<b>Present Value Revenue Requirement</b>
Electric Revenue Requirement - TTM	-	-									
Electric Revenue Requirement - BTM	-	-									

<sup>1</sup> MMBA=Master Meter Balancing Account

<p>* Decision 20-04-004, Appendix B, Table 5: New Annual Report Data Template established in 2018, updated for 10 year period 2021-2030. An appendix can be provided to define each category if needed.</p> <p>** The Census Bureau identifies two types of urban areas:</p> <ul style="list-style-type: none"> <li>• Urbanized Areas (UAs) of 50,0000 or more people;</li> <li>• Urbanized Clusters (UCs) of at least 2,5000 and less than 50,0000 people.</li> </ul> <p>"Rural" encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is: <a href="https://www.census.gov/geo/reference/urban-rural.html">https://www.census.gov/geo/reference/urban-rural.html</a>.</p> <p>***Provide as many labor cost lines with descriptions as needed to clarify types of labor included in project.</p>
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