

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 8, 2017

**Advice Letter 1053**

Justin Lee Brown  
Vice President/Regulatory Affairs  
Southwest Gas Corporation  
P O Box 98510  
Las Vegas, NV 89193-8510

**Subject: Modify Rule No. 23 – Mobilehome Park Utility  
Upgrade Program**

Dear Mr. Brown:

Advice Letter 1053 is effective as of October 6, 2017.

Sincerely,

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

Edward Randolph  
Director, Energy Division



# SOUTHWEST GAS CORPORATION

October 6, 2017

ATTN: Tariff Unit, Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102

Subject: Southwest Gas Corporation (U 905 G)  
Advice Letter No. 1053

Enclosed herewith is an original and one (1) copy of Southwest Gas Corporation's Advice Letter No. 1053, together with California Gas Tariff Sheet Nos. 279.15 and 279.18.

Sincerely,

  
Valerie J. Ontiveroz  
Regulatory Manager/California

VJO:dm  
Enclosures



# SOUTHWEST GAS CORPORATION

Advice Letter No. 1053

October 6, 2017

## PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Southwest Gas Corporation (Southwest Gas or Company) (U 905 G) tenders herewith for filing the following tariff sheets:

Cal. P.U.C. Sheet No.	California Gas Tariff Title of Sheet	Canceling Cal. P.U.C. Sheet No.
2nd Revised Sheet No. 279.15	Mobilehome Park Utility Upgrade Program	1st Revised Sheet No. 279.15
2nd Revised Sheet No. 279.18	Mobilehome Park Utility Upgrade Program (Continued)	1st Revised Sheet No. 279.18

### Purpose

The purpose of this filing is to modify Rule No. 23 – Mobilehome Park Utility Upgrade Program (MHP Program) in accordance with California Public Utilities Commission (Commission) Resolution E-4878, Ordering Paragraph (OP) 9.

### Background

On March 14, 2014, the Commission issued Decision (D.) 14-03-021, which adopted a voluntary three-year pilot MHP Program. The MHP Program's goal is to convert approximately 10 percent of the total MHP spaces within each of the California gas and electric utilities' service territories. The MHP Program approved in D.14-03-021 runs from January 1, 2015 through December 31, 2017. Pursuant to OP 13 in D.14-03-021, participating utilities were permitted to file a Tier 2 Advice Letter within 45 days of the second annual status report, or March 17, 2017, to request continuation of the MHP Program if the actual experience to that point appears to warrant continuation of the program without major modification.

Southwest Gas timely filed Advice Letter No. 1035 requesting authorization to continue the MHP Program at the following rate:

- All Tier<sup>1</sup> 2 MHPs (7 parks with a total of approximately 588 spaces) to be converted in 2018.

<sup>1</sup> Resolution E-4878 refers to the MHP priority rankings as "Categories".



Advice Letter No. 1053  
Page 2  
October 6, 2017

- Tier 3 MHPs to be converted at a rate of approximately 560 spaces beginning in 2019.

Pursuant to OP 6 in Resolution E-4878, Southwest Gas Advice Letter No. 1035-G is approved.<sup>2</sup> Additionally, OP 7 states:

The utilities, listed in Ordering Paragraphs 1-6 above, shall continue the Mobile Home Park (MHP) Utility Upgrade Pilot Program and complete all Category 1 MHP conversions as established in Decision 14-03-021 (approximately 10% of the MHP spaces) 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. However, a utility shall not begin construction of a utility upgrade project of a MHP if, at the start of the construction project, facts indicate that this conversion project would not be completed by October 31, 2019.

Therefore, through this filing Southwest Gas seeks to make minor modifications to its tariff sheets approved in its Advice Letter No. 1035 to conform with the authorization granted in Resolution E-4878.

### **Effective Date**

Pursuant to OP 9 in Resolution E-4878, 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. Southwest Gas respectfully requests this Advice Letter be effective October 6, 2017, which is the date filed.

### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 20 days after the date of this Advice Letter filing and shall be sent by letter via U.S. Mail, facsimile, or electronically mailed. The address for mailing or delivering a protest to the Commission is:

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

---

<sup>2</sup> In Advice Letter No. 1035, Southwest Gas also proposed to reopen the MHP Program application period between January 1, 2018 through March 31, 2018. However, Resolution E-4878 does not approve a new application period.



Advice Letter No. 1053  
Page 3  
October 6, 2017

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004, at the same address as above and mailed or faxed to:

Mr. Justin Lee Brown  
Vice President/Regulation & Public Affairs  
Southwest Gas Corporation  
P.O. Box 98510  
Las Vegas, NV 89193-8510  
Facsimile: 702-364-3452  
E-mail: [justin.brown@swgas.com](mailto:justin.brown@swgas.com)

**Notice**

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 in GO 96-B since this Advice Letter is being filed pursuant to OP 9 in Resolution E-4878.

**Service**

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is mailing copies of this advice letter and related tariff sheets to the utilities and interested parties shown on the attached list. Additionally, Southwest Gas is serving this Advice Letter to the service list in Rulemaking 11-02-018.

Communications regarding this filing should be directed to:

Valerie J. Ontiveroz  
Regulatory Manager/California  
Southwest Gas Corporation  
P.O. Box 98510  
Las Vegas, NV 89193-8510  
Telephone: 702-876-7323  
E-mail: [valerie.ontiveroz@swgas.com](mailto:valerie.ontiveroz@swgas.com)

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By:

A handwritten signature in blue ink, appearing to be "Justin Lee Brown", written over a horizontal line.

Justin Lee Brown

Attachments

**Distribution List**

Advice Letter No. 1053

In conformance with GO 96-B, General Rule 4.3:

The following individual has been served by regular, first-class mail:

Elizabeth Echols, Director  
Office of Ratepayer Advocates  
California Public Utilities Commission  
505 Van Ness Avenue, 4th Floor  
San Francisco, CA 94105

The following individuals or entities have been served by electronic mail:

Pacific Gas & Electric Company  
[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

Southern California Gas Company  
[ROrtiz@semprautilities.com](mailto:ROrtiz@semprautilities.com)

San Diego Gas & Electric Company  
[SDG&ETariffs@SempraUtilities.com](mailto:SDG&ETariffs@SempraUtilities.com)

Belinda Gatti  
Energy Division  
California Public Utilities Commission  
[belinda.gatti@cpuc.ca.gov](mailto:belinda.gatti@cpuc.ca.gov)

Robert M. Pocta  
Office of Ratepayer Advocates  
California Public Utilities Commission  
[rmp@cpuc.ca.gov](mailto:rmp@cpuc.ca.gov)

Nathaniel Skinner  
Office of Ratepayer Advocates  
California Public Utilities Commission  
[nws@cpuc.ca.gov](mailto:nws@cpuc.ca.gov)

Pearlie Sabino  
Office of Ratepayer Advocates  
California Public Utilities Commission  
[pzs@cpuc.ca.gov](mailto:pzs@cpuc.ca.gov)

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

<b>MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)</b>	
Company name/CPUC Utility No. <b>Southwest Gas Corporation (U 905 G)</b>	
Utility type: <input type="checkbox"/> ELC <input checked="" type="checkbox"/> GAS <input type="checkbox"/> PLC <input type="checkbox"/> HEAT <input type="checkbox"/> WATER	Contact Person: <b>Valerie J. Ontiveroz</b> Phone #: <b>(702) 876-7323</b> E-mail: <b>valerie.ontiveroz@swgas.com</b>
EXPLANATION OF UTILITY TYPE ELC = Electric    GAS = Gas PLC = Pipeline   HEAT = Heat    WATER = Water	(Date Filed/ Received Stamp by CPUC)
Advice Letter (AL) #: <b>1053</b>	
Subject of AL: <b>Modify Rule No. 23 – Mobilehome Park Utility Upgrade Program.</b>	
Keywords (choose from CPUC listing): <b>Rule</b>	
AL filing type: <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Annual <input checked="" type="checkbox"/> One-Time <input type="checkbox"/> Other	
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:	
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL <b>Not applicable</b>	
Summarize differences between the AL and the prior withdrawn or rejected AL <sup>1</sup> : <b>Not applicable</b>	
Resolution Required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Requested effective date: <b>October 6, 2017</b>	No. of tariff sheets: 2
Estimated system annual revenue effect (%): <b>Not applicable</b>	
Estimated system average rate effect (%): <b>Not applicable</b>	
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: <b>None</b>	
Service affected and changes proposed <sup>3</sup> : <b>See 'Subject of AL' above</b>	
Pending advice letters that revise the same tariff sheets: <b>Not applicable</b>	
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:	
<b>CPUC, Energy Division</b> <b>Attention: Tariff Unit</b> <b>505 Van Ness Ave.</b> <b>San Francisco, CA 94102</b> <b>E-mail: edtariffunit@cpuc.ca.gov</b>	<b>Mr. Justin Lee Brown,</b> <b>Vice-President/Regulation &amp; Public Affairs</b> <b>Southwest Gas Corporation</b> <b>P. O. Box 98510</b> <b>Las Vegas, NV 89193-8510</b> <b>E-mail: justin.brown@swgas.com</b> <b>Facsimile: 702-364-3452</b>

<sup>3</sup> Discuss in AL if more space is needed.

RULE NO. 23

MOBILEHOME PARK UTILITY UPGRADE PROGRAM

PURPOSE

This Rule sets forth the general terms and conditions applicable to the Mobilehome Park Utility Upgrade Program (MHP Program). The MHP Program is a voluntary program offered to eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (collectively referred to as MHP) to convert their submetered spaces and common use services from master-metered submetered gas distribution to direct Company gas distribution service, subject to the requirements and limitations set forth in this Rule and the applicable MHP Program documents. Pursuant to Commission Decision 14-03-021, the MHP Program was authorized as a three-year pilot program through December 31, 2017. Commission Resolution E-4878 authorizes the extension of the MHP Program through December 31, 2019, subject to the limits set forth therein.

APPLICABILITY

The MHP Program is available to all eligible master-metered submetered MHPs within the Company's service territory as defined in the Preliminary Statement of this California Gas Tariff. Within the eligible MHPs, the only eligible MHP spaces are those permitted by the California Department of Housing and Community Development (HCD). Recreational vehicle parks and spaces are not eligible for the MHP Program.

A. DEFINITIONS

Specific terms used in this Rule are defined below. Additional definitions are also found in Rule No. 1, Definitions of this California Gas Tariff.

Beyond the meter: "Beyond the meter" facilities include - the infrastructure and substructures necessary to extend facilities from the Service Delivery Point to the Mobilehome exterior line stub (i.e., the point of connection on the Mobilehome). The Company will not be responsible for any part of the point of connection material, including labor, or any work that would require an alteration permit. "Beyond the meter" facilities are the responsibility of the MHP Owner/Operator. The Mobilehome exterior line stub outlet will continue to be part of the Mobilehome and be the responsibility of the MHP Resident.

Common Use Area: All designated buildings, areas, or facilities within an MHP that are intended to be used by all MHP Residents and/or the MHP Owner/Operator. Energy costs for serving the common area are paid by the MHP Owner/Operator.



RULE NO. 23

MOBILEHOME PARK UTILITY UPGRADE PROGRAM  
(Continued)

B. PROGRAM ELIGIBILITY (Continued)

2. An MHP Owner/Operator who elects to participate in the MHP Program must comply with all general rules, rights and obligations set forth in this Rule. In addition, MHP Program participants must complete and/or execute and comply with the following MHP Program documents:
  - a. CPUC's *Application for Conversion of Master Meter Service at Mobilehome Park or Manufactured Housing Community to Direct Service from Electric or Gas Corporation* (Form of Intent);
  - b. *Mobilehome Park Utility Upgrade Program Application* (MHP Application) (Form 913.1, 07/2014); and
  - c. *Mobilehome Park Utility Upgrade Program Agreement* (MHP Agreement) (Form 931.2, 07/2014).

C. MHP PROGRAM COMPONENTS

1. Form of Intent

The Form of Intent (Appendix C to D.14-03-021) will be accepted January 1, 2015, through March 31, 2015 (90-day period). The MHP Owner/Operator must complete and submit the Form of Intent concurrently to both the Commission's Safety Enforcement Division (SED) and the Company. Any Form of Intent received after the 90-day period will be placed on a waiting list for the MHP Program.

- a. Prioritization of MHPs in the MHP Program
  - (i) All Forms of Intent received for the MHP Program 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.