

February 3, 2025

VIA ELECTRONIC FILING

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy
Executive Director
California Public Utilities Commission
505 Van Ness Avenue, Room 5th Floor
San Francisco, CA 94102
Email: EnergyDivisionCentralFiles@cpuc.ca.gov

RE: PacifiCorp (U 901-E) 2024 Annual Report on the Mobile Home Park Utility Upgrade Program

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

At the end of 2024, the Company had one active Rule 26 project, which is Xaa-wan'-k'wvt Village & Resort.

Xaa-wan'-k'wvt Village & Resort reached out to PacifiCorp in 2023 to express interest in the California Mobile Home Park Conversion Program (CA MHP Conversion Program), and PacifiCorp determined that the property qualifies for the conversion program. The Company received a Letter of Intent from the CPUC for this customer, and the Company received the CA MHP Conversion Program Application for this project on November 29, 2023.

In 2024, the Company received a quote from Northridge Electric for the cost of the Xaa-wan'-k'wvt Village & Resort. The Company anticipates that transformers for the project will be received within the next few months, and construction will begin in late spring or early summer and the conversion will be completed in 2025.

Pacific Power employee time spent on Rule 26 projects in 2024 was extremely minimal. The occasional phone call or other small tasks to ensure that the Xaa-wan'-k'wvt Village & Resort project was still on track were minimal, and the hours were not recorded. Because the rate impact of this cost is negligible (less than a fraction of one percent), the Company did not calculate the rate impact of the employee time spent on this project in 2024. There were no other recorded costs for Rule 26 in 2024.

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It is respectfully requested that all discovery requests be addressed to the following:

By Email (**preferred**): 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 or pooja.kishore@pacificorp.com.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosure

cc: Leslie Palmer, Safety and Enforcement Division
R.18-04-018 Service List

Annual Report Template*		Report for calendar year: 2023		Per-year costs; not cumulative							
Descriptor		2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Program Participation											
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)	-									
Completed Spaces	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)		-									
Cost Information											
To-The-Meter (TTM) - Capital Costs											
Construction Direct Costs											
Civil/Trenching	To the Meter Construction costs for civil related activities	-									
Electric		-									
Electric System											
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	-									
Other											
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	-									
Program - Capital Costs	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.	-									
Project Management Costs											
Project Management Office (PMO)	Program management office costs (Project Management, schedulers, cost analysts and field engineers)	-		\$ 2,833	-						
Outreach											

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.	-																	
Other																			
Labor (Internal)***		-																	
Non-Labor	Utility specific overhead driven by corporate cost model	-																	
Subtotal: To-The-Meter (TTM) - Capital Cost		0																	
To-The-Meter (TTM) - Expense Costs																			
Project Management Costs																			
Project Management Office (PMO)	Program startup cost	-																	
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	-																	
Other																			
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	-																	
Subtotal: To-The-Meter (TTM) - Expense Cost		0																	
Beyond-The-Meter (BTM)- Capital Costs		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	-																	
Electric System																			
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	-																	
Material / Structures		-																	
Other	BTM Permits, including HCD fees	-																	
Other Labor (Internal)***		-																	
Subtotal: Beyond-The-Meter (BTM) - Capital Costs		0																	
Total: TTM & BTM Costs		0																	

Rate Impact and Revenue Requirement											
Rate Impact	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	
Electric											
Average Rate w/o MMBA ¹ recovery - Total System	-		N/A	N/A							
Average Rate w/ MMBA recovery - Total System	-		N/A	N/A							
Rate change - Total System	-		N/A	N/A							
% Rate change - Total System	-		N/A	N/A							
Revenue Requirement	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Present Value Revenue Requirement
Electric Revenue Requirement - TTM	-		\$ 2,833	-							
Electric Revenue Requirement - BTM	-			-							

¹ 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"> • Urbanized Areas (UAs) of 50,0000 or more people; • Urbanized Clusters (UCs) of at least 2,5000 and less than 50,0000 people. <p>"Rural" encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is: https://www.census.gov/geo/reference/urban-rural.html.</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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