



**PUBLIC VERSION**

**Mobilehome Park Utility Conversion Program  
Annual Report**

**February 1, 2023**

# SOCALGAS MOBILEHOME PARK UTILITY CONVERSION PROGRAM

## FEBRUARY 1, 2023 ANNUAL REPORT

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# SOCALGAS MOBILEHOME PARK UTILITY CONVERSION PROGRAM

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### 1. Executive Summary

As detailed in this Report, Southern California Gas Company (“SoCalGas”) continues to successfully implement the Mobilehome Park (“MHP”) Utility Conversion Program (“Program”). As of December 31, 2022, SoCalGas has converted 303 mobilehome parks (22,534 permitted spaces), which is approximately 17% of eligible mobilehome spaces in SoCalGas’ service territory.

### 2. Procedural History

On March 13, 2014, the California Public Utilities Commission (“Commission”) approved and authorized SoCalGas to execute the Program through Decision (D.) 14-03-021. The Program was initiated as a three-year pilot (2015-2017) (“Pilot Program”) to convert master-metered/sub-metered natural gas and/or electric services to direct utility services for qualified mobilehome parks and manufactured housing communities (collectively “MHPs”). On September 28, 2017, Resolution E-4878 authorized the investor-owned utilities (“IOUs”) to continue their MHP Pilot Programs through December 31, 2019 (“Pilot Program Extension”).<sup>1</sup> SoCalGas was authorized to complete the initial 10% scope of eligible spaces and convert up to an additional 5% of eligible spaces, bringing the total scope of the three-year Pilot Program and Pilot Program Extension to 15% of eligible MHP spaces.

On March 18, 2019, the Commission issued Resolution E-4958, authorizing SoCalGas to continue its Program for eligible MHPs until the earlier of either December 31, 2021 or the issuance of a Commission Decision for the continuation, expansion or modification of the program beyond December 31, 2021 in Rulemaking (R.) 18-04-018.<sup>2</sup> Eligible MHPs were defined as those where SoCalGas and/or MHP owners had incurred “financial obligations” on or before November 1, 2018. Resolution E-4958 further determined the number of spaces converted in each of years 2020 and 2021 may not exceed 3.33% of the total master-metered spaces in a utility’s service territory, excluding MHPs that are already under conversion or scheduled for conversion. It further clarified that if a single MHP

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<sup>1</sup> Resolution E-4878, ordering paragraph (OP) 7.

<sup>2</sup> Resolution E-4958, OP 1.

upgrade would result in the utility exceeding the 3.33% maximum requirement, the utility is authorized to proceed with that upgrade.

On April 16, 2020, the Commission issued D.20-04-004, approving a ten-year Mobilehome Park Utility Conversion Program from 2021 through 2030. Following a new application period established by the Commission during the 1<sup>st</sup> quarter of 2020, SED is to provide SoCalGas, on an annual basis, with a list of MHPs comprising approximately 3.33% of eligible master-metered spaces within its service territory for a target 50% conversion by the end of 2030. This Decision also recommends a second evaluation of the MHP utility conversion program in 2025 following the first four-year application cycle (2021-2024) to decide whether to continue or modify the program.

On December 23, 2020, the Commission issued a Phase 2 Scoping Memo to further examine ways to protect residents of participating MHPs from unreasonable rent increases or evictions based on program participation, and determine whether the development of an electrification-ready service standard for participating MHPs was appropriate or feasible. On August 20, 2021, the Commission issued D.21-08-025, which adopted consumer protection requirements to keep residents of MHPs participating in the Commission's MHP Program from experiencing unreasonable rent increases or evictions based on infrastructure improvements funded through the Program. Pursuant to D.21-08-025, SoCalGas submitted Advice Letter (AL) 5877 on October 4, 2021 to: 1) update its Sample Forms - Contracts, Mobilehome Park (MHP) Utility Conversion Program (MHP Program or Program) Agreement (Form 8210) to include consumer protection measures for residents of MHPs participating in the Program; and 2) provide a description of the specific information that participating MHP owners are to provide to residents, as well as a discussion of methods the MHP owners may use to communicate these protections to their residents. AL 5877 was approved by the Commission on October 25, 2021.

On December 5, 2022, the Commission issued a proposed decision extending the statutory deadline in the Mobilehome Park Pilot Program (R.18-04-018) proceeding to October 31, 2023, in order to allow time to consider an appropriate electric service standard for the program.

This report is submitted in the format requested by the Commission’s Safety and Enforcement Division (“SED”).<sup>3</sup> Previous reports were submitted in accordance with D.14-03-021 Ordering Paragraph (OP) 10, which directs each electric and/or gas utility to prepare a status report for the Program on February 1 of each year. SoCalGas filed status reports on February 1 of 2016, 2017, 2018, 2019, 2020, 2021, and 2022. In SoCalGas’ February 1, 2016 report, SoCalGas provided a timeline for implementation of the three-year Pilot Program, its status on the timeline, the number of initial applications received, information on the MHPs that would be converted, and the number of spaces to be converted. SoCalGas also provided an update on progress made against the timeline for implementation, as well as a preliminary cost assessment and/or cost accounting of to-the-meter (“TTM”) and beyond-the-meter (“BTM”) construction costs in its February 1, 2017, February 1, 2018, February 1, 2019, February 1, 2020, February 1, 2021, and February 1, 2022 reports. This report includes information on the following: (1) a cost accounting for both TTM and BTM construction, and (2) an optional narrative assessment of the Program.

### **3. Cost Accounting**

Table 1 below (“Annual Report Template”) reflects the space counts, costs, revenue requirements, and rate impacts of projects through December 31, 2022 for which final costs have been recorded.<sup>4</sup> Classification of costs within each category are defined within the table, which was provided by SED to the participating IOUs. These costs should be considered final, with the notation that there may be additional trailing costs.<sup>5</sup> Table 2 below shows the associated revenue requirements and rate impacts.

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<sup>3</sup> The request was made in a December 21, 2018 e-mail from Fred Hanes of the CPUC’s SED to the official service list for R. 18-04-018.

<sup>4</sup> Per SED’s email, as well as the instructions applicable to the Supplemental Cost Data template sent on November 13, 2018, the template captures projects for which final costs have been recorded. Trailing costs may follow, but they are not expected to exceed approximately 5% of a project’s total cost.

<sup>5</sup> “Trailing costs” may include, but are not limited to, final contractor invoices or internal cost allocations that have not been recorded; such costs are not expected to be more than approximately 5% of the total project cost.

**TABLE 1: ANNUAL REPORT TEMPLATE**

- Bolded words in "Descriptor" column were added by SoCalGas to clarify the reported data.
- All dollar amounts in Table 1 are rounded to the nearest dollar.
- Per the SED instructions accompanying the template, Table 1 costs have been grouped by project and included in the year in which financial closure for each project was completed, with financial closure defined as when all costs have been recorded for a project. Using this methodology has resulted in a shift in reporting year for certain projects where there have been unforeseen issues requiring remediation or trailing costs within the allowable threshold in a year different than previously reported as the year of financial closure. Please refer back to prior reports for 2015 and 2016 data.

Annual Report Template		Per Year Costs (Not Cumulative)					
	Descriptor	2017	2018	2019	2020	2021	2022
<b>Program Participation</b>		<b>Per Space Results (Not Cumulative)</b>					
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion; <b>the data provided is not final as a process for capturing all CARE enrollments is still in development</b>	689	1,384	881	4,019	1,079	1,144
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion; <b>the data provided is not final as a process for capturing all MB enrollments is still in development</b>	5	6	15	25	16	8
Disadvantaged Community	Number of converted spaces (i.e., PTO count, <b>not directly corresponding with the costs below</b> ) within geographic zones defined by SB 535 map.	2,116	2,528	842	2,318	1,039	1,193
Rural Community	Number of converted spaces (i.e., PTO count, <b>not directly corresponding with the costs below</b> ) within rural community	-	-	-	-	-	-
Urban Community	Number of converted spaces (i.e., PTO count, <b>not directly corresponding with the costs below</b> ) within urban community	3,092	5,390	3,852	2,719	2,227	2,124
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	N/A	N/A	N/A	N/A	N/A	N/A

<b>Completed Spaces</b>	Spaces converted that correspond to the project costs reported below (TTM includes common areas). 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 (Gas)		3,608	4,373	3,166	5,847	2,243	1,713
Number of TTM MH and Covered Common Area Locations Converted (Electric)		N/A	N/A	N/A	N/A	N/A	N/A
Number of BTM MH Converted Register Spaces (Gas)		3,108	3,891	2,724	5,543	1,871	2,024
Number of BTM MH Converted Register Spaces (Electric)		N/A	N/A	N/A	N/A	N/A	N/A
<b>Cost Information</b>		<b>Costs Results (Not Cumulative)</b>					
<b>To The Meter - Capital Costs</b>							
<b>Construction Direct Costs</b>							
Civil/Trenching	To the Meter Construction costs for civil related activities (e.g., trench/cut excavation & backfill [joint trench], paving [temp & final], and distribution system installation - including contractor labor and materials)	-	-	-	-	-	-
Electric		N/A	N/A	N/A	N/A	N/A	N/A
Gas		11,210,079	14,405,555	9,217,795	14,909,743	7,796,608	7,241,571
<b>Gas System</b>							
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here) <b>(Specific to SoCalGas, no gas design costs were previously incorporated in this line item)</b>	3,716,594	5,708,741	3,419,966	6,079,093	2,762,874	2,134,571

Material / Structures	Pipes, fittings and other necessary materials required for gas construction	1,584,385	1,735,566	916,404	1,317,904	584,252	556,882
<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)	N/A	N/A	N/A	N/A	N/A	N/A
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	N/A	N/A	N/A	N/A	N/A	N/A
Design/Construction Management	Cost for engineering, design and construction inspection cost	4,907,245	6,722,304	4,518,304	10,360,793	2,077,567	6,770,734
<b>Other</b>							
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations, <b>including legacy system decommissioning internal labor</b>	332,177	370,549	214,815	300,219	95,499	74,229
Other Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
Non-Labor	Permits, <b>vehicle utilization, payment discounts, consultant support (e.g., environmental monitoring)</b>	139,423	54,405	112,757	-55,194	-5,439	-126,230
Materials	meters, modules and regulators	391,443	477,366	344,025	381,616	91,332	85,097
<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)	1,208,032	1,646,568	1,013,592	1,876,296	539,233	707,946
Outreach		-	-	-	-	-	
<b>Other</b>							
Property Tax	Property tax on capital spending not yet put into service	18,931	22,548	19,229	36,749	17,896	18,571

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.	161,826	164,821	146,327	247,576	79,570	84,311
Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
Non-Labor	Utility specific overhead driven by corporate cost model	744,016	999,597	695,863	1,314,360	775,562	554,710
<b>Sub-Total Capital Cost</b>		<b>24,414,151</b>	<b>32,308,019</b>	<b>20,619,078</b>	<b>36,769,155</b>	<b>14,814,953</b>	<b>18,102,392</b>
<b>To The Meter - Expense Costs</b>							
<b>Project Management Costs</b>							
Project Management Office (PMO)	Program startup cost, <b>program management activities associated with Outreach or other non-capital activities</b>	130,971	196,991	113,982	224,209	94,252	40,338
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	194,432	111,575	76,807	143,119	41,633	799,493
<b>Other</b>							
Labor (Internal)	Program startup cost for supporting organizations, <b>meter removal</b>	5,566	20,496	8,259	12,699	3,991	611
Other Labor (Internal)	<b>Construction management expenses costs (e.g., training, supplies)</b>	422,840	783,547	483,052	1,233,532	349,708	0
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project, <b>vehicle utilization, and overheads associated with meter removal</b>	16,486	21,882	-146,874	13,242	4,117	2,157
<b>Sub-Total To The Meter</b>		<b>770,296</b>	<b>1,134,492</b>	<b>535,226</b>	<b>1,626,802</b>	<b>493,701</b>	<b>842,599</b>
<b>Beyond The Meter - Capital</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						
<b>Civil/Trenching</b>	<b>All civil labor for BTM construction, such as landscaping (does not include trenching work)</b>	-	-	-	-	-	

<b>Electric System</b>							
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	N/A	N/A	N/A	N/A	N/A	N/A
Material / Structures		N/A	N/A	N/A	N/A	N/A	N/A
<b>Gas System</b>							
Labor	Labor and material for installing BTM Gas infrastructure (e.g. houselines, meter protection, foundation)	6,568,798	10,046,960	4,984,380	8,275,266	3,124,313	2,306,430
Material / Structures		2,508,515	2,733,968	1,630,093	3,931,158	1,281,215	1,081,953
<b>Other</b>							
Other Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
<b>Other Non Labor</b>	<b>BTM Permits, including HCD fees</b>	689,198	1,349,867	909,186	1,551,788	465,955	602,632
<b>Sub-Total Beyond The Meter</b>		<b>9,766,511</b>	<b>14,130,794</b>	<b>7,523,659</b>	<b>13,758,212</b>	<b>4,871,484</b>	<b>3,991,016</b>
<b>Total TTM &amp; BTM</b>		<b>34,950,958</b>	<b>47,573,305</b>	<b>28,677,962</b>	<b>52,154,169</b>	<b>20,180,138</b>	<b>22,936,007</b>

## TABLE 2: RATE IMPACT AND REVENUE REQUIREMENT

- Rate impact and revenue requirements are reported based on actual revenue requirement filings for 2015-2022 (i.e., not based on year of financial closure); 2022-2027 revenue requirements and rate impacts are forecasted based on actual filings (i.e., not forecasted program costs).
- Regulatory interest is applicable to the entire Master Meter Balancing Account (MMBA) balance which includes both TTM and BTM costs. Since the MMBA does not include subaccounts to separate the TTM and BTM balances, regulatory interest for these components of the MMBA is not available. For purposes of this response, regulatory interest is included in the “Gas Revenue Requirement – TTM” line in this table.
- The Present Value Revenue Requirement was calculated as the sum of 1) actual revenue requirements from 2015-2022 and 2) the Present Value of revenue requirements for 2023-2028 discounted to 2022 nominal dollars using SoCalGas' rate of return (7.18%). SoCalGas does not typically calculate present value of total revenue requirements for ratemaking purposes. Although amortization amounts will be collected in rates over a 12-month period, this exercise assumed simplified collection at year end.
- Revenue requirements are in thousands of dollars.
- Gas rate impact dollar amounts are rounded to the nearest hundred thousandths of a dollar to illustrate a visible rate change.

Rate Impact and Revenue Requirement														
Rate Impact	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
<b>Gas</b>														
Average Rate w/o MMBA recovery - Core	N/A	\$0.65217	\$0.57379	\$0.59324	\$0.60503	\$0.82348	\$0.88074	\$0.91464	\$0.91464	\$0.91464	\$0.91464	\$0.91464	\$0.91464	
Average Rate w/ MMBA recovery - Core	N/A	\$0.65241	\$0.57395	\$0.59465	\$0.60890	\$0.82735	\$0.88541	\$0.91920	\$0.92270	\$0.92395	\$0.92516	\$0.92582	\$0.92582	
Rate Change - Core	N/A	\$0.00024	\$0.00016	\$0.00140	\$0.00386	\$0.00387	\$0.00467	\$0.00456	\$0.00806	\$0.00931	\$0.01052	\$0.01118	\$0.01119	
% Rate Change - Core	N/A	0.04%	0.03%	0.24%	0.64%	0.47%	0.50%	0.50%	0.88%	1.02%	1.15%	1.22%	1.22%	
Average Rate w/o MMBA recovery - Non-Core	N/A	\$0.02330	\$0.02549	\$0.02956	\$0.03113	\$0.04658	\$0.06259	\$0.06337	\$0.06337	\$0.06337	\$0.06337	\$0.06337	\$0.06337	
Average Rate w/ MMBA recovery - Non-Core	N/A	\$0.02331	\$0.02550	\$0.02961	\$0.03129	\$0.04674	\$0.06283	\$0.06362	\$0.06379	\$0.06386	\$0.06393	\$0.06397	\$0.06397	
Rate Change - Non-Core	N/A	\$0.00001	\$0.00001	\$0.00005	\$0.00016	\$0.00016	\$0.00024	\$0.00024	\$0.00042	\$0.00049	\$0.00055	\$0.00059	\$0.00060	
% Rate Change - Non-Core	N/A	0.04%	0.03%	0.18%	0.52%	0.33%	0.40%	0.38%	0.66%	0.77%	0.88%	0.94%	0.95%	
<b>Electric</b>														
Average Rate w/o MMBA recovery - Total System	N/A													
Average Rate w/ MMBA recovery - Total System	N/A													
Rate Change - Total System	N/A													
% Rate Change - Total System	N/A													
<b>Revenue Requirement (In Millions)</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>Present Value Revenue Requirement</b>
Gas Revenue Requirement-TTM	\$0.000	\$0.850	\$0.617	\$3.602	\$9.505	\$9.200	\$10.961	\$14.094	\$14.315	\$13.954	\$13.545	\$13.545	\$13.545	\$71.441
Electric Revenue Requirement-TTM	N/A													
Gas Revenue Requirement-BTM	\$0.000	\$0.000	\$0.000	\$1.740	\$5.232	\$5.517	\$8.277	\$8.576	\$8.190	\$7.757	\$7.304	\$7.304	\$7.304	\$41.860
Electric Revenue Requirement-BTM	N/A													

#### 4. Program Timeline

Pursuant to Resolution E-4878, SoCalGas achieved its initial Pilot Program target of 10% in 2018 and continued conversions of up to an additional 5% of MHP spaces by December 31, 2020. As of December 31, 2022, SoCalGas has converted 303 MHPs (22,534 permitted spaces), which is approximately 17% of eligible mobilehome spaces in SoCalGas’ service territory.<sup>6</sup>

SoCalGas has measured its progress against the timeline shown in Figure 1 (“SoCalGas’ Tentative Timeline for Implementation of the MHP Program and Current Status”) below. In developing the timeline, SoCalGas assumed certain conditions, including, but not

<sup>6</sup> The scope excludes MHPs that declined to participate in the Program and the corresponding space total was calculated from the MHP permits-to-operate, rather than the SED-prioritized list of eligible MHPs. A confidential list of completed and in-progress projects has been provided to the CPUC’s Energy Division and Safety and Enforcement Division.

limited to, the following: 1) there are no constraints that may delay MHP participation, such as TTM contractor availability or a MHP Owner/Operator’s ability to move forward with a project, secure a BTM contractor, or resolve environmental issues; 2) MHP data provided by the MHP Owner/Operator in the Form of Intent (“FOI”) and at the beginning of a project is accurate; 3) there are no joint construction schedule constraints for any of the IOUs involved; and 4) the California Department of Housing and Community Development (“HCD”) or other Local Enforcement Agencies will have sufficient resources to perform timely inspections on projects.

Pursuant to Resolution E-4958 and the extension limitations set forth therein, SoCalGas substantially completed all eligible MHP upgrades in the fourth quarter of 2020. With the issuance of a Commission Decision for the continuation of the program and the new Form of Intent (FOI) application period between January 1 – March 30, 2021, a new list of eligible parks was required from SED within the second quarter of 2021.

On August 20, 2021, in accordance with the Decision, SED provided a new priority list of eligible parks. The list comprised Category 1 projects, comprised of parks estimated to be contacted by the utilities before the application period in 2025, and Category 2 projects that may be contacted before the new period but may be re-prioritized for the 2025 list. SoCalGas is currently in the process of developing a comprehensive schedule with the outlined Category 1 projects to support the overall objective of converting 50 percent of its master meters by 2030. SoCalGas has secured all interested applicants for Category 1 projects through 2025. It will also continue developing its schedule to incorporate all Category 1 MHPs, re-prioritized parks requested by SED, and substitutions for MHPs declining to move forward.

**FIGURE 1: SoCalGas’ Timeline for Implementation of the MHP Program and Current Status**



## 5. Program Challenges

Per the CPUC Decision D.20-04-004, SoCalGas developed a schedule outlined with Category 1 projects to achieve the Commission's annual 3.33% conversion target that would result in the goal of converting 50% of the master metered mobilehome parks by the end of the 10-year program. In the process of doing so, SoCalGas identified three obstacles in meeting the 3.33% annual conversion goal: 1) electric IOU interdependence; 2) a soft cap goal; and 3) a high owner decline rate.

1. In shared-service territories, SoCalGas depends on the support of electric utilities to obtain its goal of 4303 spaces annually. This space goal is the highest of all the IOUs, and it exceeds the other utilities' annual space cap. Electric IOUs have separate goals and drivers to generate their conversion lists, and it is possible for them to meet their goals without working with SoCalGas for the following reasons:
  - Southern California Edison has Southwest Gas as a partner in certain regions;
  - PG&E, as a gas and electric utility, has dual conversions in regions where it provides both services; and
  - SDG&E also has dual conversion in regions where it provides both services.

Municipal electric providers frequently decline to participate, leaving SoCalGas with Gas-only conversions. However, there are insufficient gas-only parks to capture the remaining space deficit past 2025. Since SoCalGas often partners with its respective electric counterparts to maximize cost efficiencies for the ratepayer, this means that SoCalGas' ability to meet its conversion targets could be limited by the MHP's electric utility provider. If SoCalGas' electric counterparts do not agree to convert the same MHPs, SoCalGas could have a gap in its annual 3.33% target. But more importantly, the MHPs and residents that were not or would not be upgraded that would otherwise be within SoCalGas 3.33% target would be deprived of the significant safety benefits afforded by the program.

2. A soft target for single-source utilities may not garner enough partnership from its counterpart utilities for the single-source utility to meet its goal. The 3.33% annual target serves as a soft cap that allows other utility partners to adjust annual goals downward, but IOUs are hesitant to adjust upward without stronger direction from the SED, as reasonableness for upward adjustment has not been outlined or reviewed. While the soft target intends to allow the utility to have its work ebb and flow annually while ultimately meeting its 10-year target, the soft cap mechanism hinders SoCalGas' annual 3.33% efforts.

- SoCalGas’ current outreach efforts to Category 1 projects have resulted in 4188 spaces being removed from the program due to the MHP owner’s declining to participate. The CPUC SED prioritization list also included spaces that are already converted or otherwise miscategorized; that factor has resulted in the removal of 374 spaces. These adjustments significantly impact SoCalGas’ ability to reach its 3.3% annual target -- 4188 spaces amount to an entire annual target (see 2015 baseline data below). Although SoCalGas can bring forward Category 2 parks to offset the number of declined projects, other dual conversion utilities are reluctant to do the same as they have lower targets and can continue to convert Category 1 projects within their control at the same time meet their annual conversion goal. The MHP Utility Conversion Program is voluntary, and as the rate of MHPs declining to participate increases, SoCalGas’ annual deficit towards its 3.33% goal also increases.

**Utility Space Comparison Among Utilities (2015 Baseline)**

<b>Utility Space Comparison</b>				
<b>Utility</b>	<b>Total MHP Spaces</b>	<b>Annual Conversion Rate</b>	<b>Annual Space Target</b>	<b>Total MHP Spaces in Territory, 2015 Baseline</b>
<b>SDG&amp;E</b>	694	3.33%	1,152	34,597
<b>SoCalGas</b>	1425	3.33%	4,303	129,231
<b>SCE</b>	1308	3.33%	3,555	106,768
<b>PG&amp;E</b>	1383	2.50%	2,633	105,318
<b>Southwest Gas</b>	57	450 Spaces	450 Spaces	2350
<b>PacifiCorp</b>	14	100 Spaces	100 Spaces	507
<b>Liberty</b>	17	100 Spaces	100 Spaces	633
<b>Bear Valley</b>	7	100 Spaces	100 Spaces	608

Based on D.14-03-021 and MHP Annual Reports.

## Recommendations

SoCalGas seeks to fulfill our responsibilities as a natural gas provider in California to enhance our customers' safety and reliability of mobilehome park infrastructure by meeting its conversion goals while maintaining affordability for its customers. However, given the three factors identified above, there are challenges.

Two of the three factors can be addressed to minimize SoCalGas' conversion deficit: electric utility interdependence and a soft cap goal. To support SoCalGas meeting its targets, SoCalGas has been approved to incorporate additional electric municipality and gas-only projects to meet annual conversion rates and address the electric utility interdependence. This has aided SoCalGas' ability to exhaust all available projects to aid in meeting its annual target. Unfortunately, only a limited number of projects meet these criteria, and the list of parks will be exhausted by 2025.

SoCalGas recommends adjustments to expand annual conversion rates and cost targets for other utility partners to address the soft cap goal shortfall and support SoCalGas' achievement of its annual 3.33% target. SoCalGas continues to work together with electric utilities to perform concurrent upgrades at MHPs where target mutual goals allow. However, electric utilities frequently can achieve their annual targets through their own projects, i.e., without collaborating on projects with SoCalGas. Increasing the annual targets for some of the electric utilities would allow them to collaborate with SoCalGas, such that SoCalGas can also achieve its annual target. SoCalGas further recommends that SED allow certain upgrades to proceed separately when differences in the utilities' deployment goals do not allow the utilities to convert the MHPs simultaneously. Addressing these barriers to SoCalGas' ability to meet its 3.33% annual target enhances the opportunity to provide safety and reliability enhancements through the Program to mobilehome customers.

## 6. Program Assessment

In March of 2020, the World Health Organization (WHO) declared COVID-19 a pandemic. In response, SoCalGas instituted various hygiene measures, social distancing protocols, and alternate outreach and education methods in support of the Program goals and objectives. With the COVID-19 restrictions and regulations, the Program has experienced a variety of impacts, including but not limited to:

- a decrease in inspection resources with longer-than-average permit and inspection turn-around times;
- an increase in cost due to inflation and material availability;
- additional need for outreach collateral and mailers as we shifted away from in-person townhalls, meetings, and events;
- lengthened construction durations due to the quarantining of various crew members; and
- mobile home access challenges faced by beyond-the-meter contractors.

Despite the issues faced in 2020, 2021, and 2022 the SoCalGas MHP Conversion Program continues to be successful, as demonstrated by the following performance indicators:

### **Program Penetration**

SoCalGas has successfully partnered with MHP Owners/Operators and, as of December 31, 2022, completed approximately 17% of the eligible mobilehome spaces in SoCalGas' service territory.

### **Safety Performance**

From 2014 through 2021, SoCalGas maintained a high safety standard with four reportable incidents over approximately 1,890,543 hours of labor logged between contractors and MHP program employees combined. In 2022, SoCalGas continued to maintain a high safety standard with zero reportable incidents over approximately 140,801 hours. Additionally, 303 MHPs with systems older than 40 years have received – or are in the process of receiving – new utility-owned and maintained distribution systems that meet current SoCalGas standards.

## **Customer Satisfaction**

In response to customer satisfaction surveys in 2022, SoCalGas achieved a satisfaction rate of 72% with MHP residents and 100% with MHP owners/operators.

## **7. Conclusion**

This concludes the eighth annual filing in accordance with SED's instructions.

Additional Program information can be found online on SoCalGas' website at: <https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/pipeline-safety/mobilehome-park-utility-conversion-program>.

This annual report may be accessed at: <https://www.socalgas.com/regulatory/A17-05-007>.<sup>7</sup>

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<sup>7</sup> D.20-04-004, OP 10 requires the utilities to post copies of their Annual Report on their respective websites.



**Mobilehome Park Utility Upgrade Program  
Management Certification**

California Public Utilities Commission (CPUC) Decision (D.) 14-03-021 Ordering Paragraph 11 requires that all reports be verified by an officer of the utility.

As an officer of Southern California Gas Company (SoCalGas), I hereby certify that the Mobilehome Park Utility Upgrade Program Annual Report generated in compliance with D.14-03-021 is accurate.

Reporting Period      Start Date 1/1/2022      End Date 12/31/2022

      Executed on: 2/1/2023  
Signature of Officer      Month, Day, Year

David Buczkowski      VP Gas Distribution  
Print Name      Title

### SoCalGas 2023 Annual Report List of Active Parks

\*Financial Completion: project costs have been recorded and any remaining costs not recorded are estimated to fall within 5% of total project costs

\*\*Construction Completion: cutover completed and master meter removed; final costs have not been recorded

\*\*\*PTO (Permit to Operate) counts may not represent actual spaces in scope for conversion

HCD ID	NAME	STATUS	CITY	COUNTY	PTO COUNT***	GAS IOU	ELECTRIC IOU
		Financially complete*		ORANGE		SoCalGas	N/A
		Financially complete*		SAN LUIS OBISPO		SoCalGas	PG&E
		Financially complete*		LOS ANGELES		SoCalGas	N/A
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		SAN BERNARDINO		SoCalGas	N/A
		Financially complete*		RIVERSIDE		SoCalGas	N/A
		Financially complete*		SAN BERNARDINO		SoCalGas	N/A
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		ORANGE		SoCalGas	SCE
		Financially complete*		ORANGE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		TULARE		SoCalGas	N/A





Confidential and Protected Materials Provided Pursuant to PUC Section 583, GO 66-D, and D.17-09-023

Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	N/A
Financially complete*	ORANGE	SoCalGas	N/A
Financially complete*	SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	KERN	SoCalGas	PG&E
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	SANTA BARBARA	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE

Confidential and Protected Materials Provided Pursuant to PUC Section 583, GO 66-D, and D.17-09-023

Financially complete*		ORANGE	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*		TULARE	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		RIVERSIDE	SoCalGas	N/A
Financially complete*		RIVERSIDE	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		RIVERSIDE	SoCalGas	SCE
Financially complete*		SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	N/A
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		ORANGE	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		RIVERSIDE	SoCalGas	SCE
Financially complete*		RIVERSIDE	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		RIVERSIDE	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		SAN BERNARDINO	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		VENTURA	SoCalGas	SCE
Declined		KERN	SoCalGas	PG&E
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		RIVERSIDE	SoCalGas	SCE
Financially complete*		RIVERSIDE	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		LOS ANGELES	SoCalGas	SCE
Financially complete*		KINGS	SoCalGas	SCE

Confidential and Protected Materials Provided Pursuant to PUC Section 583, GO 66-D, and D.17-09-023

Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SANTA BARBARA	SoCalGas	PG&E
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	KERN	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SDG&E
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	SANTA BARBARA	SoCalGas	N/A
Financially complete*	SANTA BARBARA	SoCalGas	PG&E
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	KERN	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	GO
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	SAN BERNARDINO	SoCalGas	N/A
Financially complete*	ORANGE	SoCalGas	SDGE
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	SANTA BARBARA	SoCalGas	N/A

Confidential and Protected Materials Provided Pursuant to PUC Section 583, GO 66-D, and D.17-09-023

Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Construction complete	ORANGE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Construction complete	LOS ANGELES	SoCalGas	SCE
Financially complete*	VENTURA	SoCalGas	SCE
In progress	ORANGE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
In progress	LOS ANGELES	SoCalGas	GO
In progress	LOS ANGELES	SoCalGas	SCE
In progress	RIVERSIDE	SoCalGas	SCE
In progress	LOS ANGELES	SoCalGas	GO
In progress	LOS ANGELES	SoCalGas	SCE
In progress	RIVERSIDE	SoCalGas	SCE
In progress	LOS ANGELES	SoCalGas	SCE
In progress	ORANGE	SoCalGas	SCE
In progress	RIVERSIDE	SoCalGas	SCE
In progress	RIVERSIDE	SoCalGas	SCE
In progress	LOS ANGELES	SoCalGas	SCE
In progress	SAN BERNARDINO	SoCalGas	SCE
In progress	TULARE	SoCalGas	GO
In progress	RIVERSIDE	SoCalGas	SCE
In progress	ORANGE	SoCalGas	SCE
In progress	LOS ANGELES	SoCalGas	SCE
In progress	SAN BERNARDINO	SoCalGas	SCE
In progress	LOS ANGELES	SoCalGas	SCE
In progress	SAN BERNARDINO	SoCalGas	SCE
In progress	TULARE	SoCalGas	GO/SCE
In progress	LOS ANGELES	SoCalGas	SCE
In progress	ORANGE	SoCalGas	SCE
In progress	ORANGE	SoCalGas	GO
In progress	SAN BERNARDINO	SoCalGas	SCE
Declined	RIVERSIDE	SoCalGas	SCE

Confidential and Protected Materials Provided Pursuant to PUC Section 583, GO 66-D, and D.17-09-023

	In progress		SAN BERNARDINO	SoCalGas	SCE
	Financially complete*		LOS ANGELES	SoCalGas	GO
	In progress		SAN BERNARDINO	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		RIVERSIDE	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	GO
	In progress		LOS ANGELES	SoCalGas	GO
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		KERN	SoCalGas	SCE
	In progress		SAN BERNARDINO	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		TULARE	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		TULARE	SoCalGas	GO
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		ORANGE	SoCalGas	GO
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		RIVERSIDE	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		RIVERSIDE	SoCalGas	SCE
	In progress		TULARE	SoCalGas	GO
	In progress		TULARE	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	SCE
	Construction complete**		INDIO	SoCalGas	GO
	In progress		PALM SPRINGS	SoCalGas	SCE
	In progress		RIVERSIDE	SoCalGas	GO
	In progress		YUCAIPA	SoCalGas	SCE
	In progress		LA VERNE	SoCalGas	SCE
	In progress		LOS ANGELES	SoCalGas	GO
	In progress		CUDAHY	SoCalGas	GO
	In progress		CUDAHY	SoCalGas	GO
	In progress		RIVERSIDE	SoCalGas	GO
	In progress		RIVERSIDE	SoCalGas	GO
	In progress		COMPTON	SoCalGas	GO
	In progress		FONTANA	SoCalGas	SCE
	In progress		NORTH HOLLYWOOD	SoCalGas	GO
	In progress		SAN LUIS OBISPO	SoCalGas	PG&E
	In progress		LOS OSOS	SoCalGas	GO
	In progress		EL MONTE	SoCalGas	SCE
	In progress		POMONA	SoCalGas	SCE
	In progress		GROVER BEACH	SoCalGas	PG&E
	In progress		SAN LUIS OBISPO	SoCalGas	PG&E
	In progress		ORANGE	SoCalGas	SCE
	In progress		GLENDORA	SoCalGas	SCE
	In progress		ORANGE	SoCalGas	SCE
	In progress		DESERT HOT SPRING	SoCalGas	SCE

Confidential and Protected Materials Provided Pursuant to PUC Section 583, GO 66-D, and D.17-09-023

In progress		COMPTON	SoCalGas	SCE
In progress		COMPTON	SoCalGas	SCE
In progress		SUMMERLAND	SoCalGas	SCE
In progress		DOWNEY	SoCalGas	SCE
In progress		BELLFLOWER	SoCalGas	SCE
In progress		SAN LUIS OBISPO	SoCalGas	PG&E
In progress		GARDENA	SoCalGas	SCE
In progress		WHITTIER	SoCalGas	SCE
In progress		EL MONTE	SoCalGas	SCE
In progress		HUNTINGTON BEACH	SoCalGas	SCE
In progress		HIGHLAND	SoCalGas	SCE
In progress		ARTESIA	SoCalGas	SCE
In progress		CARSON	SoCalGas	GO
In progress		WESTMINSTER	SoCalGas	SCE
In progress		SANTA ANA	SoCalGas	SCE
In progress		DESERT HOT SPRING	SoCalGas	SCE
In progress		HEMET	SoCalGas	SCE
In progress		HIGHLAND	SoCalGas	SCE
In progress		HUNTINGTON BEACH	SoCalGas	SCE
In progress		ANAHEIM	SoCalGas	GO
In progress		COMPTON	SoCalGas	SCE
In progress		COMPTON	SoCalGas	SCE
In progress		GLENDORA	SoCalGas	SCE
In progress		PICO RIVERA	SoCalGas	SCE
In progress		CANOGA PARK	SoCalGas	GO
In progress		CUDAHY	SoCalGas	SCE
In progress		SAN LUIS OBISPO	SoCalGas	SCE
In progress		LOS ANGELES	SoCalGas	SCE
In progress		VENTURA	SoCalGas	PG&E
In progress		SANTA BARBARA	SoCalGas	GO
In progress		IMPERIAL	SoCalGas	GO
In progress		LOS ANGELES	SoCalGas	SCE
In progress		LOS ANGELES	SoCalGas	SCE
In progress		IMPERIAL	SoCalGas	GO
In progress		IMPERIAL	SoCalGas	GO
In progress		IMPERIAL	SoCalGas	GO
In progress		IMPERIAL	SoCalGas	GO
In progress		ORANGE	SoCalGas	GO
In progress		ORANGE	SoCalGas	GO
In progress		LOS ANGELES	SoCalGas	GO
In progress		LOS ANGELES	SoCalGas	GO

**BEFORE THE PUBLIC UTILITIES  
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF MIGUEL CALDERON  
REGARDING CONFIDENTIALITY OF CERTAIN DATA  
PURSUANT TO D.17-09-023**

I, Miguel Calderon, do declare as follows:

1. I am the Distribution Special Projects Project & Execution Manager for Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by David Buczkowski, Vice President of Gas Distribution. I have reviewed the document titled “SCG 2023 Annual Rpt – List of Active Parks.xlsx” (the “SCG Active Park List”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 17-09-023 to demonstrate that the yellow-highlighted confidential information (“Protected Information”) provided in the SCG Active Park List is within the scope of data protected as confidential under applicable law, and pursuant to Public Utilities (“PUC”) Code § 583 and General Order (“GO”) 66-D, as described in the Attachment A below.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 1<sup>st</sup> day of February 2023 at Los Angeles, California.



Miguel Calderon  
Manager  
Special Portfolio Projects

**ATTACHMENT A**

**SoCalGas Request for Confidentiality on the following information contained in SCG Active Park List**

<b>Type and Location of Protected Information</b>	<b>Legal Authority</b>	<b>Narrative Justification</b>
<p>Yellow-highlighted cells in the SCG Active Park List</p>	<p>California Public Records Act (CPRA) Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p> <ul style="list-style-type: none"> <li>• Cal. Civil Code § 1798.21 (requiring agencies to "ensure the security and confidentiality of" personal data)</li> <li>• Cal. Civil Code § 1798.24 (limiting disclosure of personal information)</li> <li>• Cal. Civil Code §§ 1798.80 <i>et seq.</i> (process for protecting customer records)</li> </ul> <p>CPRA Exemption, Gov't Code § 6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy")</p>	<p>The yellow-highlighted cells contain MHP names. If publicly disclosed, such personal information could pose a risk of fraud, identity theft, or other personal, commercial, or financial damage to customers.</p> <p>Disclosure may also constitute an "unwarranted invasion of personal privacy."</p>