



PUBLIC VERSION

Mobilehome Park Utility Conversion Program

Annual Report

February 1, 2024

SOCALGAS MOBILEHOME PARK UTILITY CONVERSION PROGRAM

FEBRUARY 1, 2024 ANNUAL REPORT

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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, 2023, SoCalGas has converted 353 mobilehome parks (25,735 permitted spaces), which is approximately 20% 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”).¹ 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.) 18-04-018.² 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 upgrade would result in the utility exceeding the 3.33% maximum requirement, the utility is authorized to proceed with that upgrade.

¹ Resolution E-4878, ordering paragraph (OP) 7.

² Resolution E-4958, OP 1.

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 1st 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. Subsequently, on November 2, 2023, the Commission issued D.23-11-013 to extend the statutory deadline in this proceeding until December 31, 2024.

This report is submitted in the format requested by the Commission's Safety and Enforcement Division ("SED").³ 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, 2022, and 2023. 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

³ 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.

("BTM") construction costs in its February 1, 2017, February 1, 2018, February 1, 2019, February 1, 2020, February 1, 2021, February 1, 2022, and February 1, 2023 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, 2023 for which final costs have been recorded.⁴ 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.⁵ Table 2 below shows the associated revenue requirements and rate impacts.

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, 2016 and 2017 data.

⁴ 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.

⁵ "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.

Annual Report Template		Per-Year Results (Not Cumulative)					
	Descriptor	2018	2019	2020	2021	2022	2023
Program Participation		Per Space Results (Not Cumulative)					
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion; the data provided is not final as a process for capturing all CARE enrollments is still in development	1,384	881	4,019	1,079	1,144	1,362
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion; the data provided is not final as a process for capturing all MB enrollments is still in development	6	15	25	16	8	4
Disadvantaged Community	Number of converted spaces (i.e., Permit-To-Operate (PTO) count, not directly corresponding with the costs below) within geographic zones defined by SB 535 map.	2,528	842	2,318	1,039	1,193	2,340
Rural Community	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within rural community	-	-	-	-	-	-
Urban Community	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within urban community	5,390	3,852	2,719	2,227	2,124	3,182
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	N/A	N/A	N/A	N/A	N/A	N/A

Annual Report Template		Per-Year Results (Not Cumulative)					
	Descriptor	2018	2019	2020	2021	2022	2023
Completed Spaces	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)		4,373	3,166	5,847	2,243	1,713	2,279
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)		3,891	2,724	5,543	1,871	2,024	2,782
Number of BTM MH Converted Register Spaces (Electric)		N/A	N/A	N/A	N/A	N/A	N/A
Cost Information		Cost Results (Not Cumulative)					
To The Meter - Capital Costs							
Construction Direct Costs							
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	-	-	-	-	-	-
Electric		N/A	N/A	N/A	N/A	N/A	N/A
Gas		\$14,371,810.76	\$9,492,088.22	\$15,108,515.72	\$8,234,684.47	\$11,458,701.65	\$14,923,738.68

Annual Report Template		Per-Year Results (Not Cumulative)					
	Descriptor	2018	2019	2020	2021	2022	2023
	installation - including contractor labor and materials)						
Gas System							
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here) (Specific to SoCalGas, no gas design costs were previously incorporated in this line item)	\$364,934.66	\$209,396.28	\$300,218.87	\$1,390,064.82	\$2,923,465.32	\$2,368,207.13
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	\$1,042,090.06	\$666,175.23	\$1,281,026.09	\$606,972.96	\$843,459.73	\$1,566,146.26
Electric System							
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	\$6,465,551.71	\$5,116,017.40	\$4,454,035.52	\$4,758,285.00	\$6,770,734.08	(\$10,433,244.08)
Other							
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations, including legacy system decommissioning internal labor	\$224,198.00	\$178,150.00	\$118,700.00	\$71,673.00	\$184,860.00	\$395,605.00

Annual Report Template		Per-Year Results (Not Cumulative)					
	Descriptor	2018	2019	2020	2021	2022	2023
Other Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
Non-Labor	Permits, vehicle utilization, payment discounts, consultant support (e.g., environmental monitoring)	\$82,831.89	\$44,679.86	\$92,124.59	\$34,469.82	\$75,375.84	\$75,117.12
Materials	meters, modules and regulators	\$477,365.55	\$344,025.44	\$381,616.45	\$91,332.00	\$85,097.00	\$281,650.94
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, Program Management, schedulers, cost analysts and field engineers)	\$1,262,402.65	\$863,376.36	\$923,124.84	\$624,262.27	\$707,946.01	(\$1,279,273.21)
Outreach		-	-	-	-	-	-
Other							
Property Tax	Property tax on capital spending not yet put into service	\$21,008.65	\$19,136.85	\$36,778.00	\$60,157.79	\$115,402.30	\$69,773.00
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.	\$152,154.75	\$145,357.69	\$247,743.49	\$116,633.43	\$194,197.39	\$197,490.14
Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A

Annual Report Template		Per-Year Results (Not Cumulative)					
	Descriptor	2018	2019	2020	2021	2022	2023
Non-Labor	Utility specific overhead driven by corporate cost model	\$962,968.99	\$680,349.78	\$1,314,280.23	\$2,048,610.75	\$3,534,022.72	\$3,397,771.80
Sub-Total Capital Cost		\$25,427,317.67	\$17,758,753.11	\$24,258,163.81	\$18,037,146.31	\$26,893,262.04	\$11,562,982.78
To The Meter - Expense Costs							
Project Management Costs							
Project Management Office (PMO)	Program startup cost, program management activities associated with Outreach or other non-capital activities	\$93,089.00	\$103,534.00	\$68,375.00	\$38,989.00	\$40,338.00	\$52,584.00
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	\$368,885.00	(\$208,260.00)	\$177,229.00	\$573,548.00	\$799,492.78	\$834,991.60
Other							
Labor (Internal)	Program startup cost for supporting organizations, meter removal	\$10,281.00	\$25,193.00	\$7,881.00	\$3,414.00	\$530.00	\$744.00
Other Labor (Internal)	Construction management expenses costs (e.g., training, supplies)	\$625,058.00	\$947,411.00	\$576,514.00	\$38,175.00	\$0.00	\$0.00
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project, vehicle utilization, and overheads associated with meter removal	\$35,861.61	(\$10,636.56)	(\$2,090.01)	\$1,578.11	\$1,582.16	\$85.78
Sub-Total To The Meter		\$1,133,174.61	\$857,241.44	\$827,908.99	\$655,704.11	\$841,942.94	\$888,405.38

Annual Report Template		Per-Year Results (Not Cumulative)					
	Descriptor	2018	2019	2020	2021	2022	2023
Beyond The Meter - Capital	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	All civil labor for BTM construction, such as landscaping (does not include trenching work)	-	-	-	-		
Electric System							
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
Gas System							
Labor	Labor and material for installing BTM Gas infrastructure (e.g. houselines, meter protection, foundation)	\$9,918,430.34	\$4,897,455.16	\$8,275,265.65	\$3,281,731.37	\$3,558,438.13	\$3,405,011.00
Material / Structures		\$2,691,322.65	\$1,584,963.00	\$3,931,158.38	\$1,472,054.87	\$1,717,048.61	\$1,932,580.00
Other							
Other Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
Other Non Labor	BTM Permits, including HCD fees	\$1,336,132.00	\$895,880.00	\$1,551,788.27	\$397,256.82	\$648,636.67	\$409,376.00
Sub-Total Beyond The Meter		\$13,945,884.99	\$7,378,298.16	\$13,758,212.30	\$5,151,043.06	\$5,924,123.41	\$5,746,967.00
Total TTM & BTM		\$40,506,377.27	\$25,994,292.71	\$38,844,285.10	\$23,843,893.48	\$33,659,328.39	\$18,198,355.16

TABLE 2: RATE IMPACT AND REVENUE REQUIREMENT

- Rate impact and revenue requirements are reported based on actual revenue requirement filings for 2015-2023 (i.e., not based on year of financial closure); 2024-2027 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 2015-2023 and 2) the present value of the projected revenue requirement for 2024-2027 using the rate of 7.67%. 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	
Gas														
Average Rate w/o MMBA recovery - Core	N/A	\$0.65217	\$0.57379	\$0.59324	\$0.60503	\$0.82348	\$0.88074	\$0.91464	\$0.97874	\$0.99909	\$0.99909	\$0.99909	\$0.99909	
Average Rate w/ MMBA recovery - Core	N/A	\$0.65241	\$0.57395	\$0.59465	\$0.60890	\$0.82735	\$0.88541	\$0.91920	\$0.98515	\$1.00624	\$1.00864	\$1.00855	\$1.00950	
Rate Change - Core	N/A	\$0.00024	\$0.00016	\$0.00140	\$0.00386	\$0.00387	\$0.00467	\$0.00456	\$0.00640	\$0.00714	\$0.00955	\$0.00945	\$0.01040	
% Rate Change - Core	N/A	0.04%	0.03%	0.24%	0.64%	0.47%	0.50%	0.50%	0.65%	0.72%	0.96%	0.95%	1.04%	
Average Rate w/o MMBA recovery - Non-Core	N/A	\$0.02330	\$0.02549	\$0.02956	\$0.03113	\$0.04658	\$0.06259	\$0.06337	\$0.08102	\$0.12659	\$0.12659	\$0.12659	\$0.12659	
Average Rate w/ MMBA recovery - Non-Core	N/A	\$0.02331	\$0.02550	\$0.02961	\$0.03129	\$0.04674	\$0.06283	\$0.06362	\$0.08141	\$0.12703	\$0.12934	\$0.12936	\$0.12943	
Rate Change - Non-Core	N/A	\$0.00001	\$0.00001	\$0.00005	\$0.00016	\$0.00016	\$0.00024	\$0.00024	\$0.00039	\$0.00044	\$0.00275	\$0.00278	\$0.00284	
% Rate Change - Non-Core	N/A	0.04%	0.03%	0.18%	0.52%	0.33%	0.40%	0.38%	0.49%	0.35%	2.17%	2.19%	2.24%	
Electric														
Average Rate w/o MMBA recovery - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Average Rate w/ MMBA recovery - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Rate Change - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
% Rate Change - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Revenue Requirement (In Millions)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Present Value Revenue Requirement
Gas Revenue Requirement-TTM	\$0.000	\$0.850	\$0.617	\$3.602	\$7.460	\$9.200	\$10.658	\$10.309	\$14.653	\$16.329	\$18.355	\$15.729	\$17.282	\$113.960
Electric Revenue Requirement-TTM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas Revenue Requirement-BTM	\$0.000	\$0.000	\$0.000	\$1.740	\$4.474	\$5.517	\$6.946	\$6.873	\$9.768	\$10.886	\$14.717	\$16.961	\$19.036	\$85.709
Electric Revenue Requirement-BTM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	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, 2023, SoCalGas has converted 353 MHPs (25,735 permitted spaces), which is approximately 20% of eligible mobilehome spaces in SoCalGas' service territory.⁶

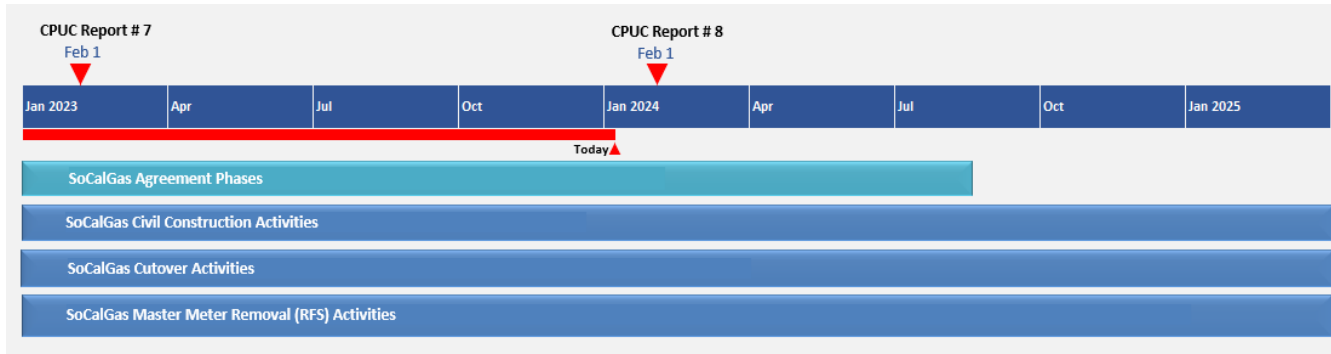
SoCalGas has measured its progress against the timeline shown in Figure 1 ("SoCalGas' Tentative Timeline for Implementation of the MHP Program and Current Status") below. In developing the timeline, SoCalGas assumed certain conditions, including, but not limited to, the following: 1) there are no constraints that may delay MHP participation, such as TTM contractor availability or an 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 identified 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 has created a comprehensive schedule focusing on Category 1 projects and has initiated the process of securing applications for Category 2 projects. This effort aligns with the goal of converting 50 percent MHP master meters in our service territory by 2030. SoCalGas has obtained commitments from all interested applicants for Category 1 projects through 2025. Furthermore, the company plans to continuously refine our schedule, incorporating all re-prioritized parks requested by SED and managing substitutions for MHPs that may decline to move forward.

⁶ 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.

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



5. Program Challenges

Per CPUC Decision D.20-04-004, SoCalGas has outlined a schedule of current and future projects to achieve the Commission’s annual 3.33% conversion target that would promote realizing the goal of converting 50% of the master metered mobilehome parks by the end of the 10-year program. In doing so, SoCalGas identified three obstacles in meeting the 3.33% annual conversion goal in future years: 1) electric IOU interdependence; 2) annual conversion 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 exceeds the other utilities' annual space cap. Electric IOUs have separate goals and drivers to generate their conversion lists, and they can meet their goals without working with SoCalGas for the following reasons:
 - Southern California Edison has Southwest Gas and PG&E 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. This has allowed SoCalGas to be flexible in the schedule and promote meeting annual goals. However, there are insufficient gas-only parks to capture the remaining space deficit past 2026. 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.

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.
3. SoCalGas' current outreach efforts to Category 1 projects have resulted in 5098 spaces being removed from the program due to the MHP owner 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 460 spaces. These adjustments significantly impact SoCalGas' ability to reach its 3.3% annual target -- 5558 spaces amount to an entire annual target (see 2015 baseline data below). Although SoCalGas has begun to pull 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 and simultaneously meet their annual conversion goal.

Utility Space Comparison Among Utilities (2015 Baseline)⁷

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

6. 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 2026.

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 working with electric utilities

⁷ Based on D.14-03-021 and MHP Annual Reports.

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 electric utilities would allow them to collaborate with SoCalGas so 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.

7. Cost Assessment

In 2023, SoCalGas faced a dynamic landscape marked by several factors that impacted the costs within its Mobilehome Park Utility Conversion Program. These key drivers each presented unique challenges and played a crucial role in shaping the program's financial course throughout the year. As a result of interdependencies with other utilities, SoCalGas had to incorporate gas-only projects into the program to compensate for the gap in spaces needed to support meeting annual conversion goals, leading to additional costs associated with permits, trenching, and restoration. The prioritization of smaller parks, driven by their high-priority status, added more parks to the annual conversion goals. While we were able to address a critical need, it increased the complexity of cost management, necessitating additional resources, permits, and oversight to meet the elevated target.

Furthermore, heightened labor rates impacted the overall cost structure, reflecting the economic challenges of recruiting and retaining skilled personnel for the program's implementation for our contractors. Coupled with the unique circumstance of working with multiple utilities and navigating through different safety requirements and unions, it created a complex situation for managing the existing contractor workforce. The overall cost impact was influenced by the rise in material costs, with factors such as supply chain disruptions, increased demand, and global economic conditions contributing to a surge in material prices, adding a substantial financial burden to the program's execution.

In addition to these challenges, SoCalGas identified additional projects in outlying areas that currently rely on a first-stage regulator (FSR). Current requirements dictate the modification of FSR to a regulator station, as serving multiple individual residents is not feasible as part of the conversion process. This aspect adds another layer of complexity to the ongoing efforts and considerations within the Mobilehome Park Utility Conversion Program. The interplay of these factors highlights the complexities and challenges SoCalGas has had to navigate in its ongoing efforts to implement the MHP Conversion Program.

8. Program Assessment

2023 marked completion of the second full year since transitioning to the 10-year program in 2021. In 2022, SoCalGas began ramp-up efforts with joint utility partners to support annual and program conversion goals. SoCalGas received the CPUC SED prioritization list toward the end of 2021, which resulted in 2022 serving as a staging year for future program success. While navigating the pandemic's difficulties, SoCalGas continued to institute various hygiene measures, social distancing protocols, and alternate outreach and education methods in support of the program's goals and objectives. Although the World Health Organization (WHO) declared an end to COVID-19 in May of 2023, several impacts remain 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 to facilitate in-person townhalls, meetings, and events, as some residents continue to avoid large crowds; and
- mobile home access challenges faced by beyond-the-meter contractors.

Despite the issues faced from 2020-2023, the SoCalGas MHP Conversion Program continues to be successful, as demonstrated by the following performance indicators:

9. Program Penetration

SoCalGas has successfully partnered with MHP Owners/Operators and, as of December 31, 2023, completed approximately 20% of the eligible mobilehome spaces in SoCalGas' service territory.

10. Safety Performance

From 2014 through 2022, SoCalGas maintained a high safety standard with four reportable incidents over approximately 2,031,344 hours of labor logged between contractors and MHP program employees combined. In 2023, SoCalGas continued to maintain a high safety standard with zero reportable incidents over approximately 214,424.70 hours. Additionally, 353 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.

11. Customer Satisfaction

In response to customer satisfaction surveys in 2023, SoCalGas achieved a satisfaction rate of 78% with MHP residents and 100% with MHP owners/operators.

12. Conclusion

This concludes the ninth 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>.⁸

⁸ D.20-04-004, OP 10 requires the utilities to post copies of their Annual Report on their respective websites.

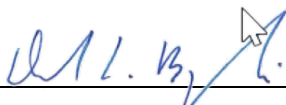


**Mobilehome Park Utility Upgrade Program
Management Certification**

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: 1/1/2023 to 12/31/2023
Start Date End Date

 Executed on: 2/1/2024
Signature of Officer Month, Day, Year

David Buczkowski VP Gas Distribution
Print Name Title

SoCalGas 2024 Annual Report List of Active Parks

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		Financially complete*		LOS ANGELES		SoCalGas	SCE
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		Financially complete*		LOS ANGELES		SoCalGas	SCE
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		Financially complete*		LOS ANGELES		SoCalGas	SCE
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		Financially complete*		SAN BERNARDINO		SoCalGas	SCE
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		Financially complete*		TULARE		SoCalGas	SCE
		Financially complete*		TULARE		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	N/A
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		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
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		Financially complete*		RIVERSIDE		SoCalGas	N/A
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		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
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		Financially complete*		ORANGE		SoCalGas	SDGE
		Financially complete*		LOS ANGELES		SoCalGas	N/A
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		Construction complete**		LOS ANGELES		SoCalGas	SCE
		Construction complete**		RIVERSIDE		SoCalGas	SCE
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		Construction complete**		LOS ANGELES		SoCalGas	SCE
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		Construction complete**		LOS ANGELES		SoCalGas	SCE
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		In progress		RIVERSIDE		SoCalGas	SCE
		Declined		RIVERSIDE		SoCalGas	SCE
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		In progress		LOS ANGELES		SoCalGas	SCE
		In progress		SAN BERNARDINO		SoCalGas	SCE
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		In progress		TULARE		SoCalGas	GO/SCE
		Construction complete**		LOS ANGELES		SoCalGas	SCE
		In progress		ORANGE		SoCalGas	SCE
		Financially complete*		ORANGE		SoCalGas	N/A
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		In progress		KERN		SoCalGas	SCE
		Construction complete**		SAN BERNARDINO		SoCalGas	SCE
		Construction complete**		LOS ANGELES		SoCalGas	SCE
		In progress		TULARE		SoCalGas	SCE
		In progress		LOS ANGELES		SoCalGas	SCE
		Financially complete*		TULARE		SoCalGas	N/A
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		ORANGE		SoCalGas	N/A
		In progress		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Construction complete**		RIVERSIDE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Construction complete**		RIVERSIDE		SoCalGas	SCE

SoCalGas 2024 Annual Report List of Active Parks

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**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*		TULARE		SoCalGas	N/A
		In progress		TULARE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		In progress		LOS ANGELES		SoCalGas	SCE
		Constr complete**		INDIO		SoCalGas	N/A
		In progress		PALM SPRINGS		SoCalGas	SCE
		Construction complete**		RIVERSIDE		SoCalGas	N/A
		Construction complete**		YUCAIPA		SoCalGas	SCE
		In progress		LA VERNE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	N/A
		Financially complete*		CUDAHY		SoCalGas	N/A
		Declined		CUDAHY		SoCalGas	N/A
		Financially complete*		RIVERSIDE		SoCalGas	N/A
		Financially complete*		RIVERSIDE		SoCalGas	N/A
		Financially complete*		COMPTON		SoCalGas	N/A
		In progress		FONTANA		SoCalGas	SCE
		Financially complete*		NORTH HOLLYWO		SoCalGas	N/A
		In progress		SAN LUIS OBISPO		SoCalGas	PG&E
		In progress		LOS OSOS		SoCalGas	N/A
		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
		Financially complete*		ORANGE		SoCalGas	SCE
		In progress		DESERT HOT SPRIN		SoCalGas	SCE
		In progress		COMPTON		SoCalGas	SCE
		In progress		COMPTON		SoCalGas	SCE
		In progress		SUMMERLAND		SoCalGas	SCE
		Construction complete**		DOWNEY		SoCalGas	SCE
		Financially complete*		BELLFLOWER		SoCalGas	SCE
		In progress		SAN LUIS OBISPO		SoCalGas	PG&E
		In progress		GARDENA		SoCalGas	SCE
		In progress		WHITTIER		SoCalGas	SCE

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HCD ID	NAME	STATUS	CITY	COUNTY	PTO COUNT***	GAS IOU	ELECTRIC IOU
		In progress		EL MONTE		SoCalGas	SCE
		In progress		HUNTINGTON BEA		SoCalGas	SCE
		Construction complete**		HIGHLAND		SoCalGas	SCE
		In progress		ARTESIA		SoCalGas	SCE
		In progress		CARSON		SoCalGas	N/A
		In progress		WESTMINSTER		SoCalGas	SCE
		In progress		SANTA ANA		SoCalGas	SCE
		In progress		DESERT HOT SPRIN		SoCalGas	SCE
		In progress		HEMET		SoCalGas	SCE
		In progress		HIGHLAND		SoCalGas	SCE
		In progress		HUNTINGTON BEAC		SoCalGas	SCE
		In progress		ANAHEIM		SoCalGas	N/A
		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	N/A
		Declined		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	N/A
		Construction complete**		IMPERIAL		SoCalGas	N/A
		In progress		LOS ANGELES		SoCalGas	SCE
		In progress		LOS ANGELES		SoCalGas	SCE
		In progress		IMPERIAL		SoCalGas	N/A
		Declined		IMPERIAL		SoCalGas	N/A
		In progress		IMPERIAL		SoCalGas	N/A
		In progress		IMPERIAL		SoCalGas	N/A
		Declined		ORANGE		SoCalGas	N/A
		In progress		ORANGE		SoCalGas	N/A
		In progress		LOS ANGELES		SoCalGas	N/A
		In progress		LOS ANGELES		SoCalGas	N/A
		In progress		SAN BERNARDINO		SoCalGas	SCE
		In progress		SAN BERNARDINO		SoCalGas	SCE

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		In progress		VENTURA		SoCalGas	SCE
		In progress		SAN BERNARDINO		SoCalGas	SCE
		In progress		LOS ANGELES		SoCalGas	N/A
		In progress		LOS ANGELES		SoCalGas	N/A
		In progress		VENTURA		SoCalGas	SCE
		In progress		SAN BERNARDINO		SoCalGas	SCE
		In progress		SAN BERNARDINO		SoCalGas	SCE
		In progress		SAN BERNARDINO		SoCalGas	SCE

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

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

I, Miguel Calderon, do declare as follows:

1. I am the Distribution Special Portfolio Projects and 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 for SoCalGas. I have reviewed the confidential information included within SoCalGas’s Mobilehome Park Utility Conversion Program Annual Report (“Annual Report”). 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 belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 17-09-023 and modified in D.19-01-028, D.20-08-031, and D.21-09-020 and General Order (“GO”) 66-D to demonstrate that the confidential information (“Protected Information”) provided in the Annual Report is within the scope of data protected as confidential under applicable law.

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 31st day of January 2024 at Los Angeles, California.



Miguel Calderon
Execution Manager
Distribution Special Portfolio Projects

ATTACHMENT A

**SoCalGas Request for Confidentiality on the following Protected Information in its
Mobilehome Park Utility Conversion Program Annual Report**

Description and Location of Data	Legal Citations	Narrative Justification
<p>Information highlighted in yellow in the accompanying List of Active Parks to SoCalGas’s Mobilehome Park (MHP) Utility Conversion Program Annual Report contains customer information (i.e., California Department of Housing and Community Identification (HCD ID), MHP names, city, and Permit to Operate (PTO) count).</p>	<p>California Public Records Act (CPRA) Exemption, Gov’t Code § 7927.705 (“Records, the disclosure of which is exempted or prohibited pursuant to federal or state law”):</p> <ul style="list-style-type: none"> • Cal. Civil Code § 1798.21 (requiring agencies to “ensure the security and confidentiality of” personal data) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Civil Code §§ 1798.80 <i>et seq.</i> (process for protecting customer records) <p>CPRA Exemption, Gov’t Code § 7927.700 (“disclosure of which would constitute an unwarranted invasion of personal privacy”).</p>	<p>The yellow-highlighted cells contain customer information that is market-sensitive and, if revealed, could put the MHP at an unfair business disadvantage because it provides nonpublic information regarding MHP program participation. Unfair business disadvantages include but are not limited to: (1) a competitive disadvantage in which other MHP owners who have not participated in a similar program may use this information to their advantage, potentially attracting residents away from the disclosed park. (2) Difficulty in attracting investors. Prospective investors or partners may be hesitant to get involved with a MHP park whose owner has participated in a program, fearing potential financial risks or challenges tied to easements and their ability to develop the property. (3) Impact on property values. Knowledge of the owner's participation in a program could raise concerns among current and potential residents about the financial health of the MHP park. This, in turn, could impact property values within the MHP park.</p> <p>Disclosure may also constitute an “unwarranted invasion of personal privacy.”</p>