



*Pacific Gas and
Electric Company*[®]



Mobilehome Park Utility Conversion Program 2023 Report to the California Public Utilities Commission

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PUBLIC VERSION

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM
2023 REPORT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION

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A. Mobilehome Park Utility Conversion Program Overview

1. Executive Summary

Through the California Public Utilities Commission's (CPUC or Commission) Mobilehome Park (MHP) Utility Conversion Program (UCP or Program), participating utilities work to replace MHP owned and operated utility systems with direct public utility gas and electric service for individual MHP residents. Decision (D.) 20-04-004 directed Pacific Gas and Electric Company (PG&E) to convert approximately 2.5 percent of mobilehome spaces in its service territory annually with an annual soft cap of \$80 million dollars; PG&E has met this requirement in 2023. This report provides a programmatic review of 2023's trends, spending, and conversions in the Program.

2. Procedural History

On March 14, 2014, the Commission issued D.14-03-021, approving a three year "living pilot" Program (Pilot) to convert 10 percent of MHP spaces in California from master-meter service to direct utility service.¹

PG&E filed Advice Letters (AL) 3822-G/5033-E, 3822-G-A/5033-E-A, 3822-G-B/5033-E-B on March 17, 2017, March 28, 2017, and August 10, 2017, respectively, to confirm completion of the Pilot Program and request to continue the Program beyond 2018 consistent with Commission direction. These were subsequently approved in Resolution (Res.) E-4878, allowing PG&E to continue its MHP Pilot until the earlier of either December 31, 2019, or the issuance of a Commission decision for the continuation, expansion, or modification of the program beyond December 31, 2019. The number of spaces converted in 2018 and 2019 was not to exceed the levels specified in each investor-owned utility's respective AL filings.

On March 18, 2019, Res.E-4958 authorized all participating electric and gas utilities to continue their MHP Pilot 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.

¹ D.14-03-021.

On April 16, 2020, the Commission issued D.20-04-004, establishing a 10-year MHP UCP, beginning in 2021, which modified certain eligibility, annual target conversion rates, and cost targets from the Pilot.

On July 31, 2023, the assigned Administrative Law Judge distributed a Staff Proposal in R.18-04-018 that recommended the adoption of a 200-amp electric service standard for MHPs treated through the MHP UCP. The Staff Proposal also recommended the creation of an initiative to assess the costs, feasibility, and impacts of full electrification of a sample of MHPs located throughout the state.

3. Program Vision

Working with the CPUC's Safety Enforcement Division (SED) and the California Department of Housing and Community Development (HCD), PG&E will provide safe, and reliable energy for MHP residents.

4. Report Objectives

Pursuant to D.20-04-004,² PG&E shall annually prepare a report for the MHP UCP utilizing the Revised Annual Report Template.³ This Annual Report is a comprehensive accounting of the 2023 year and includes:

- A narrative assessment of the MHP Program;
- An updated conversion data and financials displayed with the use of Table 5 in D.20-04-004; and
- An updated list of all MHP conversions completed, including city and county, space count, gas utility company and electric utility company performing each conversion.

5. Program Timeline and Current Progress

PG&E completed its second full year of the MHP UCP in 2023, after transitioning from the Pilot in 2021. As of December 31, 2023, PG&E has completed 177 MHP projects, which includes 14,991 permitted mobilehome spaces.

² D.20-04-004, Ordering Paragraph (OP) 10.

³ D.20-04-004, Appendix B, Table 5: New Annual Report Data Template.

At the start of 2024, there are 161 active parks in PG&E’s portfolio in different project phases:

1. Outreach (39 parks);
2. Planning (17 parks);
3. Application (43 parks);
4. Design (24 parks);
5. Construction (25 parks); and
6. Closeout (13 parks).

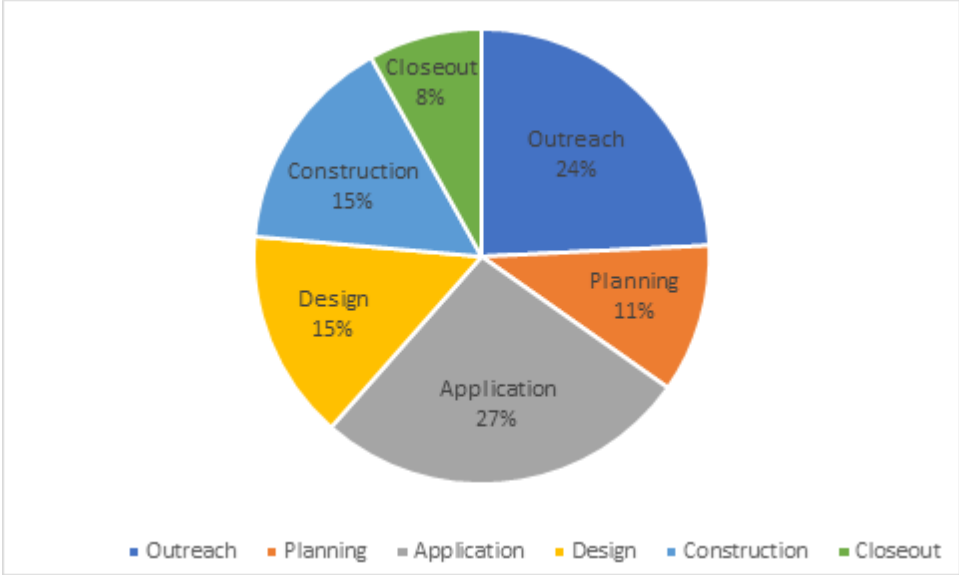


Figure 1: PG&E 2024 MHP UCP Portfolio Breakdown

The approximate timeline for completion of these phases is indicated in Figure 2, below. The 39 parks in the outreach phase do not have forecasted schedules as they will be determined upon beginning the Planning Phase.

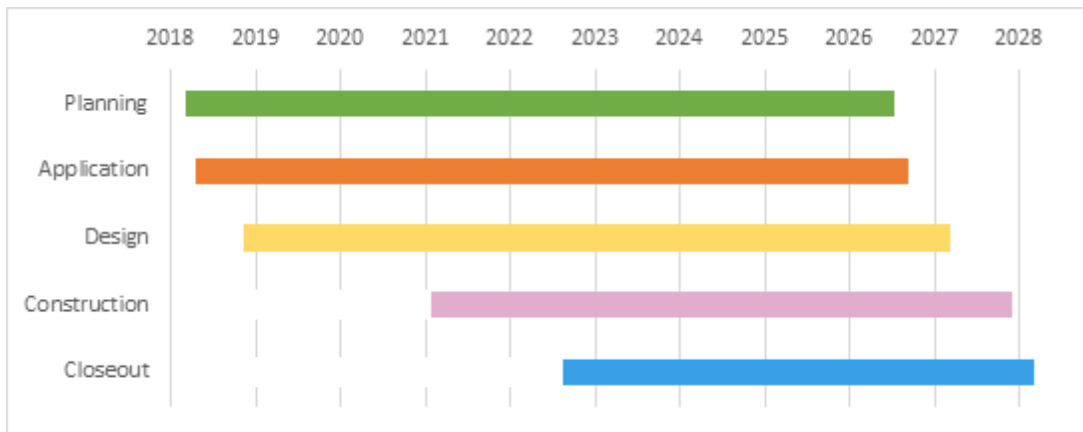


Figure 2: Implementation Timeline for 2024 PG&E Portfolio

The schedule is subject to change and assumes that there are no obstacles to prevent an MHP’s participation in the Program, such as the MHP owner’s ability and willingness to: (1) complete and move forward with a detailed application, (2) execute the Program Agreement, (3) grant the required easements, (4) secure a qualified Beyond-The-Meter (BTM) contractor, (5) finance the BTM construction activities and To-The-Meter (TTM) scope that are not covered under D.20-04-004, as well as (6) meet the prescribed program schedule.

Further assumptions include, but are not limited to, the total number of MHP spaces indicated on the Form of Intent completed by the MHP owners is accurate, the ability for a joint schedule to be developed, accepted, and executed by all impacted utilities where shared territory requires joint construction. The schedule is further dependent on availability of both TTM and BTM contractors having qualified crews to perform construction and HCD and/or other jurisdictional agencies having available trained resources to perform timely inspections on completed portions of the projects. PG&E’s schedule is expected to change throughout the Program’s life.

PG&E has successfully concluded outreach to all parks designated by the CPUC in Category 1 and is working to initiate the planning phase for the last of these parks by the close of 2025. PG&E has also begun soliciting applications from Category 2 parks and successfully contacted 27 of the 418 parks listed, as of December 31, 2023.

5.1 Potential Delays

Going forward, PG&E anticipates several factors may begin, or continue, impacting the pace of conversion as PG&E progresses through the remaining MHPs on the SED's prioritization list, discussed below.

5.1.1 Supply Chain Delays

Construction schedules continue to be impacted by supply chain delays, as highlighted in last year's annual report. To date, pedestal availability appears to be the most significant of all material delays, with lead times exceeding 52 weeks at times. Furthermore, manufacturers and/or distributors have occasionally changed committed delivery dates with little notice, making it difficult to find alternative models or develop plans to mitigate delays. For example, a participating MHP project in Santa Clara County was forecasted to be substantially complete in 2023. Most electric construction was completed by June 2023 in anticipation of a similar delivery timeframe, but the manufacturer moved the delivery date multiple times owing to insufficient supply relative to demand. The revised commitment date is forecast for February 2024.

Electric pedestals are classified as a BTM material and therefore, the responsibility to procure and install them are the responsibility of the parties in contract, the MHP owner and the BTM vendor. The lack of a contractual relationship limits PG&E's intervention or ability to mitigate delays. PG&E will continue to partner with the owner and their representatives to the best of their ability.

Additional delays could materialize due to potential regulatory changes proposed in the CPUC's R.18-04-018 Phase 2B Staff Proposal, issued on July 25, 2023. It includes a recommendation to adopt a 200-amp electric service standard to enable future mobilehome electrification. While this standard has not been finalized, if approved, PG&E will need to re-evaluate Program execution timelines, due to the necessity to procure 200-amp pedestals instead of 100-amp pedestals. 200-amp pedestals are not widely used at MHPs for residential applications and PG&E anticipates an increase in lead times as manufacturers increase 200-amp pedestal production.

5.1.2 Santa Nella Utility Conversion Project (SNUC Project)

On April 27, 2023, the Commission issued D.23-04-057 to address the potential loss of natural gas service for a portion of the Santa Nella MHP, whose private master metered gas provider, SNME Inc., was experiencing financial difficulties. The Decision ordered the conversion of the SNME gas system from master metered service to direct metered service.⁴

Simultaneously, both the TTM infrastructure and BTM infrastructure will be upgraded to accommodate 200-amp electric service to each home.⁵ PG&E's MHP UCP will complete this work with resources, budget and scheduling originally allocated to the conversion of parks on the CPUC priority list.

5.1.3 Local Jurisdictions Disallow Poles in Right of Ways

Increasingly, local jurisdictions in PG&E's service territory are implementing policies that impact the construction of new utility poles within public rights-of-way for new developments. Generally, upgrades performed through the MHP UCP involve the installation of several new poles, mainly to ensure the existing overhead PG&E system can be connected to the newly installed underground electric infrastructure. In jurisdictions where these new prohibitions are in place, denials of encroachment permits have led to alternative proposals that require additional materials and resources, and associated costs. Scope increase generally include additional trenching in the right-of-way and additional long lead electric assets. Recently, an encroachment permit sought for a MHP conversion involving a pole installation in the right of way was denied. The alternative proposal cost approximately 10 percent more than the original construction price. Project completion is now forecast for December 2024 instead of August 2024, as originally established in the construction baseline schedule.

5.1.4 Local Municipalities Versus HCD Jurisdiction

Enforcing BTM permitting in MHPs is the responsibility of HCD in most jurisdictions throughout California. Occasionally, local jurisdictions take on this responsibility. In these jurisdictions, PG&E has noted instances where permits are not granted to the MHP owner or owner's representative due to cited

⁴ D.23-04-057, OP 1.

⁵ D.23-04-057, OP 2.

requirements issued by a local jurisdiction and not normally enforced by HCD. These disputes have the potential to cause unforeseen delays in project completion.

5.2 Programmatic Implementation

PG&E collaborated with the Commission on the following matters of programmatic implementation:

5.2.1 Gas Stubs

The MHP UCP Agreement indicates that vacant mobilehome spaces will receive a stub to the location of the future “Service Delivery Point.”⁶ Since inception of the Program, PG&E has complied with this direction by installing a full-length service. After a review of a sample of previously converted parks with vacant spaces, it is apparent that the vast majority of these spaces remain vacant and the newly installed full-length service remain unused (i.e., idle facilities). These idle facilities pose two significant issues for the program: unused cost borne from the ratepayer and safety risk. PG&E’s Gas Distribution team regularly revisits idle facilities in the system and expends resources to perform cutoffs. With the latter, the newly installed facilities that are unused increases the chance of safety incidents (i.e., dig ins). To comply with the Agreement, as of December 31, 2023, PG&E will now only provide a short gas extension, generally 3’ in length, off the gas mainline instead of a full-length service.

In recent discussions with CPUC Staff, PG&E has highlighted its concerns for the Commission to consider modification of the MHP UCP Agreement in the upcoming revision window expected to begin in 2025 to forego the gas stub all together. PG&E will continue to install these stubs, in compliance, until further notice.

5.2.2 Electrification

PG&E appreciates the opportunity to provide feedback to the Staff Proposal recommending the adoption of a 200-amp electric service standard for MHPs treated through the MHP UCP, and looks forward to continued stakeholder partnerships to ensure successful future program implementation.

⁶ D.20-04-004, p. 224.

6. Cost Assessment

Attachment 1 (“Annual Report Template”) reflects the space counts and costs of projects through December 31, 2023. These costs are final, subject to any potential trailing costs.⁷

B. Conclusion

Pursuant to D.14-03-021, OP 8, a reasonableness review of all completed Program projects is performed in PG&E’s General Rate Case (GRC). For further details regarding specific projects from Program inception through December 31, 2017, please refer to PG&E’s 2020 GRC.⁸ For projects completed between January 1, 2018, and December 31, 2020, please refer to PG&E’s filing in Track 2 of its 2023 GRC.⁹ PG&E will be submitting specific project details for all projects completed between 2021 and 2024 in PG&E’s 2027 GRC.

⁷ Trailing costs include, but are not limited to, contractor invoices, internal labor charges, or other costs which may not have been received within PG&E’s closing period.

⁸ A.18-12-009, PG&E 2020 GRC, Exhibit (PG&E-12), Chapter 13 (Revised June 18, 2019).

⁹ A.21-06-021, PG&E 2023 GRC, Track 2 Prepared Testimony, Chapter 5.

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2023
REPORT TO THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
ATTACHMENT 1
ANNUAL REPORT TEMPLATE

Annual Report Template*		Per year costs, not cumulative									
		2015	2016	2017	2018	2019	2020	2021	2022	2023	
Program Participation											
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA	0	112 Customers	378 Customers	1,331 Customers	343 Customers	689 Customers	525 Customers	752 Customers	876 Customers	
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	0	13 Customers	100 Customers	69 Customers	53 Customers	85 Customers	33 Customers	82 Customers	53 Customers	
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 835 map	0	77	139	1,395	137	618	491	543	490	
Rural Community**	Number of converted spaces within rural community	0	49	26	27	1,248	0	0	0	453	
Urban Community**	Number of converted spaces within urban community	0	211	974	3,342	2,465	846	941	1,547	1,547	
Leak Survey (Optional)	Number of Leaks identified during pre-construction activity (if known) <i>Note: gas leak figures are revised from previous report. Peak previously reported the total quantity of leaks reported in this report are those identified at temporarily closed parks only.</i>	0	33	90	370	246	38	65	143	121	
Completed Spaces***	Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project began.										
Number of TTM MH and Covered Common Area Locations Converted (Gas)		0	265	890	3,054	3,535	1,168	828	1,567	2,022	
Number of TTM MH and Covered Common Area Locations Converted (Electric)		0	167	844	2,903	3,114	1,123	695	1,412	1,186	
Number of TTM MH Converted (Gas)		0	261	856	2,887	3,533	1,108	813	1,547	1,991	
Number of TTM MH Converted (Electric)		0	167	818	2,633	2,979	1,057	692	1,411	1,173	
Cost Information											
To The Meter - Capital Costs											
Construction Direct Costs											
Electric	To the Meter Construction costs for civil related activities	\$ -	\$ 3,380,455.66	\$ 15,543,358.83	\$ 16,535,576.87	\$ 24,623,811.96	\$ 7,701,185.08	\$ 4,686,453.08	\$ 8,879,333.00	\$ 8,655,772.99	
Gas		\$ -	\$ 3,073,693.13	\$ 12,851,293.32	\$ 14,980,285.28	\$ 23,886,529.81	\$ 5,827,771.26	\$ 3,335,245.00	\$ 3,103,189.21	\$ 13,527,171.29	
Gas System	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)	\$ -	\$ 1,846,728.94	\$ 6,417,966.86	\$ 5,447,011.07	\$ 9,411,143.72	\$ 2,147,792.28	\$ 2,012,388.17	\$ 3,309,498.48	\$ 4,921,525.26	
Labor	Pipes, fittings and other necessary materials required for gas construction	\$ -	\$ 533,258.63	\$ 1,853,077.72	\$ 1,572,870.60	\$ 2,717,547.49	\$ 620,193.22	\$ 581,094.13	\$ 955,645.73	\$ 1,421,132.12	
Material/Structures	Cost for installation of distribution electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	\$ -	\$ 1,851,374.10	\$ 7,946,654.65	\$ 9,022,738.61	\$ 13,122,223.38	\$ 4,206,521.06	\$ 2,559,822.08	\$ 4,850,045.92	\$ 4,727,715.07	
Electric System	Cables, conduits, poles, transformers and other necessary materials for electrical construction (Design/Construction Management)	\$ -	\$ 854,710.42	\$ 3,668,632.73	\$ 4,165,459.83	\$ 6,036,041.47	\$ 1,941,594.00	\$ 1,181,774.45	\$ 2,239,085.44	\$ 2,182,609.85	
Labor	Cost for engineering, design and construction inspection cost	\$ -	\$ 2,616,623.78	\$ 7,530,946.37	\$ 7,036,462.87	\$ 13,019,473.31	\$ 4,018,563.12	\$ 3,214,477.49	\$ 5,479,522.24	\$ 6,486,102.81	
Material/Structures		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Design/Construction Management		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Other											

Rate Impact and Revenue Requirement		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Gas												
Average Rate w/o MMBB recovery - non CARE		1,496,700 \$	1,477,460 \$	1,597,710 \$	1,519,220 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$
Average Rate w/ MMBB recovery - non CARE		1,496,600 \$	1,477,100 \$	1,597,840 \$	1,518,700 \$	1,612,440 \$	1,613,290 \$	1,613,290 \$	1,612,440 \$	1,612,440 \$	1,612,000 \$	1,611,900 \$
Rate Change - non Care		0.000900 \$	0.001250 \$	0.001130 \$	0.000550 \$	0.010140 \$	0.010990 \$	0.010990 \$	0.010130 \$	0.010130 \$	0.009710 \$	0.009290 \$
% Rate Change - non Care		0.01%	0.08%	0.07%	0.17%	0.63%	0.71%	0.69%	0.66%	0.63%	0.61%	0.58%
Average Rate w/o MMBB recovery - Non-Care		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Average Rate w/ MMBB recovery - Non-Care		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Rate Change - Non-Care		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
% Rate Change - Non-Care		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Electric												
Average Rate w/o MMBB recovery - Total		0.177250 \$	0.177724 \$	0.187716 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$
Average Rate w/ MMBB recovery - Total		0.177250 \$	0.177624 \$	0.187792 \$	0.195219 \$	0.195219 \$	0.195219 \$	0.195219 \$	0.195219 \$	0.195219 \$	0.195219 \$	0.195219 \$
Rate Change - Total System		0.000000 \$	0.000008 \$	0.000017 \$	0.000091 \$	0.000038 \$	0.000038 \$	0.000038 \$	0.000038 \$	0.000038 \$	0.000038 \$	0.000038 \$
% Rate Change - Total System		0.00%	0.02%	0.01%	0.05%	0.16%	0.18%	0.18%	0.17%	0.16%	0.16%	0.15%
Revenue Requirement												
Gas Revenue Requirement TTM		3,008,794 \$	1,969,069 \$	4,011,942 \$	12,653,985 \$	18,726,604 \$	19,562,405 \$	19,197,637 \$	18,602,911 \$	18,076,694 \$	17,463,480 \$	16,916,713 \$
Electric Revenue Requirement TTM		2,988,688 \$	1,743,831 \$	3,762,280 \$	13,203,572 \$	18,896,651 \$	20,134,406 \$	19,711,245 \$	19,084,547 \$	18,472,035 \$	17,872,307 \$	17,286,704 \$
Gas Revenue Requirement BTM		- \$	134,910 \$	3,384,210 \$	4,250,100 \$	7,559,278 \$	83,563,333 \$	7,878,868 \$	7,414,811 \$	6,950,399 \$	6,485,297 \$	6,021,535 \$
Electric Revenue Requirement BTM		- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$
Total		5,997,482 \$	3,847,810 \$	7,778,432 \$	26,107,657 \$	37,182,533 \$	39,696,811 \$	39,008,882 \$	37,687,452 \$	36,548,729 \$	34,948,777 \$	33,943,212 \$
Present Value Requirement		113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$	113,324,174 \$

*An appendix can be provided to define each category if needed
 **The Census Bureau identifies two types of urban areas: Metropolitan Statistical Areas (MSAs) of 50,000 or more people; and Non-Metropolitan Statistical Areas (NMSAs) of at least 2,500 and less than 50,000 people.
 ***"Rural" encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is: <https://www.census.gov/geo/reference/urban.html>.
 ****Completed space count includes spaces in parks and recreation areas, and spaces in residential areas for recovery under the Rule 25 MHP BIRNY Correction Program. For 2023, the total TTM + BTM spend does not include the cost associated borne from the Camp Fire parks as it is not available at the time of reporting. Cost accounting will be updated in 2024 annual report.
 *****Provide as many labor cost lines with descriptions as needed to clarify types of labor included in project.
 *****The credit indicated in 2021 was due to a change order settlement with a vendor on project cost in 2020. Due to the timing of the change order, the cost was not reallocated to the associated capital projects in time within 2020 and was reallocated in 2021, causing a credit in 2021.

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2023
REPORT TO THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
ATTACHMENT 2
MOBILEHOME PARK LIST

2023 CPUC Annual Report - MHP List

HCDID	Category	Park Name	Space Count	Status	Electric Utility	Gas Utility	City	County
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	LOCKEFORD	SAN JOAQUIN
	1			Conversion Complete	City of Lodi	PG&E	LODI	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	BAYWOOD PARK	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	ATASCADERO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	SAN LUIS OBISPO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	PASO ROBLES	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	ARROYO GRANDE	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	PG&E	BRISBANE	SAN MATEO
	1			Conversion Complete	PG&E	PG&E	EAST PALO ALTO	SAN MATEO
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	LOS GATOS	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	BOULDER CREEK	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	APTOS	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SCOTTS VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	CAPITOLA	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SCOTTS VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	BURNEY	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	City of Lake Shasta	PG&E	SUMMIT CITY	SHASTA
	1			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	1			Conversion Complete	PG&E	PG&E	COTTONWOOD	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	BENICIA	SOLANO
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	COTATI	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	HEALDSBURG	SONOMA

2023 CPUC Annual Report - MHP List

HCDID	Category	Park Name	Space Count	Status	Electric Utility	Gas Utility	City	County
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	YUBA CITY	SUTTER
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	DAVIS	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	MARYSVILLE	YUBA
	1			Conversion Complete	PG&E	Southern California Gas Company	LOS ALAMOS	SANTA BARBARA
	2			Conversion Complete	PG&E	PG&E	IONE	AMADOR
	2			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	2			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	2			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	MCKINLEYVILLE	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	2			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	2			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	2			Conversion Complete	PG&E	PG&E	GRANITE BAY	PLACER
	2			Conversion Complete	SMUD	PG&E	CITRUS HEIGHTS	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	SACRAMENTO	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	2			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	2			Conversion Complete	PG&E	PG&E	SEBASTOPOL	SONOMA
	2.1			Conversion Complete	SMUD	PG&E	WEST SACRAMENTO	SACRAMENTO
	2.1			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	3			Conversion Complete	PG&E	PG&E	MADERA	MADERA
	3			Conversion Complete	SMUD	PG&E	ORANGEVALE	SACRAMENTO
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	2			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	CONCORD	CONTRA COSTA
	2			Conversion Complete	PG&E	PG&E	VALLEJO	SOLANO
	2			Conversion Complete	PG&E	PG&E	MILPITAS	SANTA CLARA
	3			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	2			Conversion Complete	PG&E	PG&E	PETALUMA	SONOMA
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	LODI	SAN JOAQUIN
	3			Conversion Complete	N/A	PG&E	MARYSVILLE	YUBA
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	3			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	3			Conversion Complete	SMUD	PG&E	ELK GROVE	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	2			Conversion Complete	SMUD	PG&E	RANCHO CORDOVA	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	ANTIOCH	CONTRA COSTA
	3			Conversion Complete	PG&E	PG&E	LODI	SAN JOAQUIN
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	3			Conversion Complete	PG&E	PG&E	ESPARTO	YOLO
	2			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA

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HCDID	Category	Park Name	Space Count	Status	Electric Utility	Gas Utility	City	County
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	2			Conversion Complete	PG&E	PG&E	AUBURN	PLACER
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	3			Conversion Complete	N/A	PG&E	HYDESVILLE	HUMBOLDT

Note: Some parks affected by the Camp Fire have scope eligible for recovery under the Rule 28 MHP Utility Conversion Program. Scope and associated costs eligible to be covered under the Rule 28 Mobilehome Park Utility Conversion Program Agreement were separated from scope and associated costs covered under the Butte County MHP Rebuild Agreement.

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2023
REPORT TO THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
ATTACHMENT 3
OFFICER VERIFICATION

VERIFICATION

I, Sumeet Singh, say:

I am an officer of Pacific Gas and Electric Company (PG&E), a California corporation, and am authorized pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the California Public Utilities Commission to make this Verification for and on behalf of PG&E. I have read the foregoing Report and I am informed and believe that the matters therein concerning PG&E are true. Therefore, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Oakland, California, on this 23rd day of January 2024.

/S/ _____

Sumeet Singh

Executive Vice President, Operations and Chief Operating Officer