



**Mobilehome Park Utility Conversion Program
Annual Report**

February 2, 2026

SOCALGAS MOBILEHOME PARK UTILITY CONVERSION PROGRAM

FEBRUARY 2, 2026 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, 2025, SoCalGas has converted¹ 468 mobilehome parks (covering 35,547² permitted spaces), which is approximately 28% of eligible mobilehome spaces in SoCalGas’ service territory.

2. Relevant 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”).³ 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.) 18-04-018.⁴ 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

¹ “Converted” MHPs are those where System Cutover has occurred and the Master Meter has been removed.

² Permit to Operate(PTO) counts may not represent actual spaces in scope for conversion.

³ Resolution E-4878, ordering paragraph (OP) 7.

⁴ Resolution E-4958, OP 1.

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 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.

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 19, 2024, the Commission issued D.24-12-037 in which it adopted a 200-amp standard for "To-the-Meter" (TTM) and "Beyond-the-Meter" (BTM) connections for MHPs in the existing Utility Conversion Program and implemented mid-program evaluation criteria. Utilities were ordered to comply with the 200-amp standard within nine months from the decision using the cost recovery method previously established. A report on the 200-amp standard's appropriateness will be developed by 2030. SoCalGas, while not an electric utility, collaborates with utilities for joint utility parks to meet 200-amp standards. In accordance with the Decision, on September 19, 2025, SoCalGas submitted Advice Letter No. 6534-G to the Commission incorporating the required 200-amp electric service standard language into the Mobilehome Park Utility Conversion Program Agreement (Form 8210).

On July 3, 2025, SED provided SoCalGas with an updated Mobilehome Park Utility Conversion Program Prioritization List, incorporating new applicants from the 2025 open application period along with re-prioritizations driven by appeals, catastrophic events, and updated risk data. This updated list was intended to support the utility's ongoing outreach efforts, without disrupting projects already in planning, permitting, or construction phases.

This report is submitted in the format requested by the Commission’s Safety and Enforcement Division (“SED”).⁵ 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 annual status reports on February 1 of each year from 2016 through 2025. 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 provided annual updates on implementation progress and preliminary cost assessments for To-the-Meter (TTM) and Beyond-the-Meter (BTM) construction in its February 1 reports from 2017 through 2025. 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: (“Annual Report Template”) reflects the space counts and cost data for all mobile home parks that reached financial completion through December 31, 2025, for which final costs have been recorded.⁶ 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.⁷ The included Table 1 supersedes all previously submitted versions of Annual Report Table 1.

Table 2 below shows the associated revenue requirements and rate impacts.

To continuously enhance the accuracy of our reporting and better align with the report's intent to capture space counts and the majority of project costs post-cutover, SoCalGas refined its interpretation of financially complete with the report submitted in February 2025. This updated interpretation, based on a more precise reference date of when all financial activities have been completed, has been applied to the costs and spaces starting in 2024 and moving forward.

⁵ 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.

⁶ 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.

⁷ “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 the "Descriptor" column were added by SoCalGas to clarify the reported data.
- All dollar amounts in Table 1 are rounded to the nearest dollar.
- Template language across all IOUs is the same. SoCalGas' enrollment counts for CARE and Medical are final per each calendar year. FERA is an electric-only program and is not applicable to SoCalGas.
- 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. Financial closure is defined as the conversion of the mobile home park, with a majority of a project's final costs having been booked. Any trailing charges for a given park are added to the total costs for the year in which that park was initially deemed financially complete. Therefore, prior year costs reported in Table 1 may differ from prior reports due to the addition of trailing costs incurred within the current reporting period.

Annual Report Template		2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
	Descriptor										
Program Participation											
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	29	986	1,745	1,466	2,919	1,158	1,484	1,050	1,909	2,902
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	1	8	6	8	21	10	8	4	6	24
Disadvantaged Community	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within geographic zones defined by SB 535 map.	132	2,470	2,322	1,376	1,738	802	1,246	1,179	1,567	2,249
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	132	3,723	5,424	4,148	4,274	2,322	3,230	2,473	3,890	5,844
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Completed Spaces											
Number of TTM MH and Covered Common Area Locations Converted (Gas)	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.	135	3,746	5,309	3,852	4,108	2,109	3,185	2,417	3,715	5,656
Number of TTM MH and Covered Common Area Locations Converted (Electric)		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of BTM MH Converted Register Spaces (Gas)		111	3,194	4,690	3,517	3,855	2,060	3,155	2,394	3,653	5,508
Number of BTM MH Converted Register Spaces (Electric)		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Annual Report Template		2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
	Descriptor										
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 installation - including contractor labor and materials)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Electric		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas		\$ 284,151	\$ 10,545,669	\$ 15,668,331	\$ 12,985,494	\$ 12,407,582	\$ 5,542,443	\$ 7,829,028	\$ 5,782,503	\$ 9,565,678	\$ 14,170,163
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)	\$ 100,444	\$ 3,576,552	\$ 5,701,138	\$ 4,721,509	\$ 4,513,386	\$ 2,477,230	\$ 3,719,519	\$ 3,556,984	\$ 5,661,139	\$ 7,428,078
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	\$ 78,847	\$ 1,643,799	\$ 2,045,908	\$ 1,053,075	\$ 922,519	\$ 516,441	\$ 977,457	\$ 698,200	\$ 1,316,085	\$ 2,764,721
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	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	N/A	N/A	N/A	N/A
Design/Construction Management	Cost for engineering, design and construction inspection cost	\$ 172,546	\$ 4,996,415	\$ 7,272,300	\$ 6,835,903	\$ 8,319,344	\$ 3,829,741	\$ 5,024,324	\$ 3,565,888	\$ 5,545,627	\$ 7,645,977
Other											
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations, including legacy system decommissioning internal labor	\$ 11,681	\$ 304,572	\$ 219,799	\$ 226,836	\$ 150,240	\$ 1,487,667	\$ 3,362,286	\$ 2,132,440	\$ 3,525,366	\$ 4,032,714
Other Labor (Internal)		N/A	N/A	N/A	N/A	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)	\$ 3,260	\$ 211,861	\$ (1,994)	\$ 236,057	\$ (86,446)	\$ 845,473	\$ 2,084,197	\$ 1,295,843	\$ 2,269,577	\$ 3,314,397
Materials	meters, modules and regulators	\$ 14,522	\$ 406,395	\$ 583,670	\$ 406,428	\$ 340,242	\$ 92,161	\$ 315,755	\$ 329,881	\$ 513,267	\$ 540,401

*Negative values in Non-Labor for the 2018 and 2020 billing periods occur because payment discounts on all purchases are depicted on this row, and exceeded the expenditures for the remaining Other Non-Labor items (permits, vehicle utilization, and consultant support such as environmental monitoring).

Annual Report Template		2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
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)	\$ 45,203	\$ 1,229,092	\$ 1,773,663	\$ 1,427,479	\$ 1,533,339	\$ 751,761	\$ 734,791	\$ 521,500	\$ 1,054,250	\$ 1,168,377
Outreach		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Other											
Property Tax	Property tax on capital spending not yet put into service	\$ 122	\$ 19,802	\$ 23,546	\$ 27,884	\$ 31,413	\$ 65,268	\$ 139,784	\$ 47,456	\$ 70,986	\$ 100,926
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.	\$ 2,397	\$ 165,230	\$ 173,509	\$ 219,859	\$ 194,088	\$ 118,984	\$ 254,136	\$ 107,176	\$ 390,563	\$ 472,516
Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-Labor	Utility specific overhead driven by corporate cost model	\$ 23,137	\$ 754,856	\$ 1,057,123	\$ 1,043,527	\$ 1,147,855	\$ 2,061,763	\$ 4,223,678	\$ 2,788,566	\$ 4,636,458	\$ 5,511,468
Sub-Total Capital Cost		\$ 736,310	\$ 23,854,243	\$ 34,516,992	\$ 29,184,052	\$ 29,473,560	\$ 17,788,933	\$ 28,664,955	\$ 20,826,437	\$ 34,548,995	\$ 47,149,738
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	\$ 4,307	\$ 132,938	\$ 213,127	\$ 159,314	\$ 190,864	\$ 94,339	\$ 26,983	\$ 19,912	\$ 33,016	\$ 46,201
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	\$ 18,920	\$ 582,774	\$ 935,848	\$ 810,288	\$ 1,098,951	\$ 649,246	\$ 636,482	\$ 469,681	\$ 778,799	\$ 1,089,797
Other											
Labor (Internal)	Program startup cost for supporting organizations, meter removal	\$ 824	\$ 89,259	\$ 159,478	\$ 89,160	\$ 78,410	\$ 30,354	\$ 65,117	\$ 61,995	\$ 126,838	\$ 162,018
Other Labor (Internal)	Construction management expenses costs (e.g., training, supplies)	\$ 14,707	\$ 427,363	\$ 846,468	\$ 738,898	\$ 1,029,939	\$ 307,710	\$ 51,623	\$ 38,094	\$ 63,166	\$ 88,390
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	\$ 421	\$ 15,159	\$ 27,344	\$ 20,595	\$ 9,401	\$ 6,079	\$ 12,044	\$ 6,546	\$ 31,114	\$ 27,437
Sub-Total To The Meter		\$ 39,179	\$ 1,247,495	\$ 2,182,266	\$ 1,818,256	\$ 2,407,565	\$ 1,087,727	\$ 792,249	\$ 596,229	\$ 1,032,933	\$ 1,413,842

Annual Report Template		2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
	Descriptor										
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	N/A	N/A	N/A	N/A
Material / Structures		N/A	N/A	N/A	N/A	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)	\$ 123,899	\$ 6,371,221	\$ 11,005,559	\$ 7,160,010	\$ 6,488,584	\$ 3,090,906	\$ 3,995,357	\$ 3,175,435	\$ 4,949,549	\$ 7,212,576
Material / Structures		\$ 193,291	\$ 2,401,646	\$ 2,962,483	\$ 2,654,489	\$ 3,011,163	\$ 1,441,548	\$ 1,945,053	\$ 1,746,975	\$ 3,129,750	\$ 4,378,216
Other											
Other Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Non Labor	BTM Permits, including HCD fees	\$ 26,981	\$ 720,958	\$ 1,405,331	\$ 1,527,485	\$ 926,294	\$ 393,904	\$ 818,122	\$ 375,340	\$ 666,025	\$ 1,829,050
Sub-Total Beyond The Meter		\$ 344,171	\$ 9,493,826	\$ 15,373,373	\$ 11,341,984	\$ 10,426,041	\$ 4,926,358	\$ 6,758,533	\$ 5,297,750	\$ 8,745,324	\$ 13,419,841
Total TTM & BTM - New		\$ 1,119,660	\$ 34,595,564	\$ 52,072,631	\$ 42,344,292	\$ 42,307,167	\$ 23,803,018	\$ 36,215,736	\$ 26,720,415	\$ 44,327,252	\$ 61,983,421

TABLE 2: RATE IMPACT AND REVENUE REQUIREMENT

- Rate impact and revenue requirements are reported based on actual revenue requirement filings for 2015-2025 (i.e., not based on year of financial closure); 2026-2031 revenue requirements and rate impacts are based on forecasted program costs.
- The Present Value Revenue Requirement was calculated as the sum of 1) actual revenue requirements from 2015-2025 and 2) the present value of the projected revenue requirement for 2026-2031 using the rate of 7.52%. 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 depiction assumes simplified collection at year-end.
- Revenue requirements are in millions 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	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	
Gas													
Average Rate w/o MMBA recovery - Core	\$0.82348	\$0.88074	\$0.91464	\$0.97874	\$0.99909	\$1.03448	\$1.20178	\$1.20178	\$1.20178	\$1.20178	\$1.20178	\$1.20178	
Average Rate w/ MMBA recovery - Core	\$0.82735	\$0.88541	\$0.91920	\$0.98515	\$1.00624	\$1.04944	\$1.21198	\$1.21470	\$1.21649	\$1.21837	\$1.22041	\$1.22236	
Rate Change - Core	\$0.00387	\$0.00467	\$0.00456	\$0.00640	\$0.00714	\$0.01497	\$0.01020	\$0.01292	\$0.01471	\$0.01659	\$0.01863	\$0.02058	
% Rate Change - Core	0.47%	0.50%	0.50%	0.65%	0.72%	1.45%	0.85%	1.08%	1.22%	1.38%	1.55%	1.71%	
Average Rate w/o MMBA recovery - Non-Core	\$0.04658	\$0.06259	\$0.06337	\$0.08102	\$0.12659	\$0.09869	\$0.12511	\$0.12511	\$0.12511	\$0.12511	\$0.12511	\$0.12511	
Average Rate w/ MMBA recovery - Non-Core	\$0.04674	\$0.06283	\$0.06362	\$0.08141	\$0.12703	\$0.09959	\$0.12586	\$0.12608	\$0.12621	\$0.12636	\$0.12651	\$0.12667	
Rate Change - Non-Core	\$0.00016	\$0.00024	\$0.00024	\$0.00039	\$0.00044	\$0.00090	\$0.00075	\$0.00097	\$0.00110	\$0.00125	\$0.00140	\$0.00156	
% Rate Change - Non-Core	0.33%	0.40%	0.38%	0.49%	0.35%	0.91%	0.60%	0.78%	0.88%	1.00%	1.12%	1.25%	
Electric													
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												
Revenue Requirement (In Millions)	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Present Value Revenue Requirement
Gas Revenue Requirement-TTM	\$9.200	\$10.658	\$10.309	\$14.653	\$16.329	\$41.474	\$27.156	\$30.452	\$36.041	\$42.065	\$48.021	\$53.753	\$295.428
Electric Revenue Requirement-TTM	N/A												
Gas Revenue Requirement-BTM	\$5.517	\$6.946	\$6.873	\$9.768	\$10.886	\$13.825	\$9.052	\$15.388	\$16.130	\$16.788	\$18.029	\$19.213	\$132.278
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 completed additional conversions of up to 5% by December 31, 2020. As of December 31, 2025, SoCalGas has converted 468 MHPs (amounting to 35,547 permitted spaces), representing approximately 28% of eligible spaces within SoCalGas' service territory.⁸

Progress has been measured against the timeline shown in Figure 1 ("SoCalGas' Tentative Timeline for Implementation of the MHP Program and Current Status"). In developing the timeline, SoCalGas assumed the following conditions:

1. 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. Accurate data provided by the MHP Owner/Operator in the Form of Intent ("FOI") and at project initiation.
3. No joint construction schedule constraints with IOUs.
4. Sufficient resources from the California Department of Housing and Community Development ("HCD") or other Local Enforcement Agencies to perform timely inspections on projects.

Pursuant to Resolution E-4958 and the extension limitations set forth therein, SoCalGas 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 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.

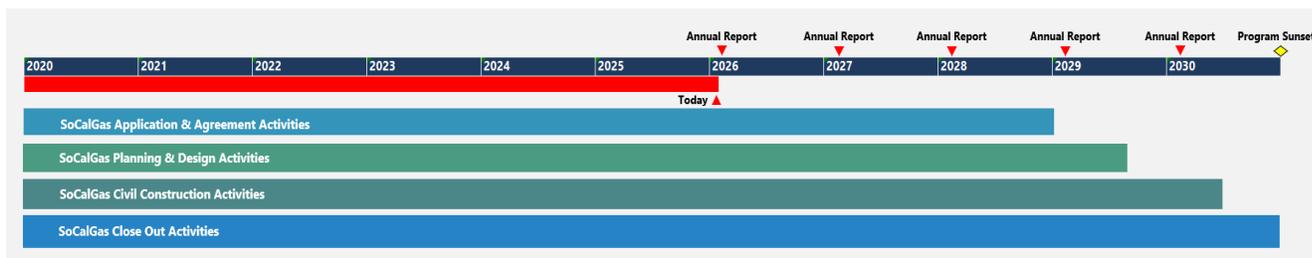
On August 20, 2021, in accordance with the Decision, SED provided a new priority list of eligible parks. The list identified Category 1 projects, comprised of parks estimated to be contacted by the utilities prior to the 2025 application period, and Category 2 projects, which could be contacted before the new period but could be re-prioritized for the 2025 list.

SoCalGas developed a comprehensive schedule focusing on Category 1 projects and began securing applications for Category 2 projects, consistent with the goal of converting 50% of MHP master meters in its service territory by 2030. Commitments were obtained from all interested applicants for Category 1 projects through 2025, except where owners have declined participation or requested construction postponement.

⁸ 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.

On July 3, 2025, SED issued an updated prioritization list, incorporating new applicants from the 2025 open application period, and re-prioritizations driven by appeals, catastrophic events, and updated risk data. Based on this new prioritization, SoCalGas is actively working to obtain commitments from MHP owners/operators on the updated list and continues to refine its schedule to accommodate the re-prioritized parks and to substitute for MHPs that decline to move forward. These efforts support SoCalGas’ commitment to achieving the program’s long-term goal of converting 50% of master-metered MHPs by 2030.

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



5. Program Challenges

Pursuant to Decision D.20 04 004, SoCalGas continues to plan and execute projects to support the Commission’s annual 3.33% conversion target, advancing toward converting 50% of master metered mobilehome parks by the end of the 10-year program. While progress remains steady, several constraints may affect annual delivery:

- Utility Interdependencies:** Conversion schedules require coordination with electric utilities that operate under differing annual targets and timelines. In shared-service territories, SoCalGas depends on joint electric utility participation to achieve its annual goal of 4,303 spaces—the highest among the IOUs and exceeding other utilities’ annual space goals. Because the joint electric utilities have smaller independent space targets and a larger proportion of parks that are not joint with SoCalGas, they can meet their program goals without coordinating joint projects. This lack of alignment can delay or eliminate opportunities for concurrent construction, extend overall project timelines, and create gaps in SoCalGas’ ability to meet its annual 3.33% target
- Electrification Initiative Prioritization:** Under D.25-11-009, any parks selected for the Electrification Initiative must be elevated to the top of the MHP UCP priority list regardless of their original position. This mandated reprioritization would shift joint-utility scheduling toward electric-led projects and reduce the pool of parks available for traditional joint conversions. In addition, the spaces converted under the Initiative would count toward each electric IOU’s annual

conversion totals, which further limits the number of shared-service parks available for SoCalGas to meet its own annual space target.

- **Limited Gas-Only Opportunities:** While SED has approved SoCalGas to incorporate additional Gas Only projects, the overall inventory remains limited, reducing flexibility and challenging the ability to balance annual conversion goals.
- **Owner Declinations:** Participation by park owners is voluntary. Declines or deferrals—whether due to site readiness, financing, or internal considerations—reduce the pool of eligible projects and can impact annual conversion levels.
- **BTM Contractor Coordination:** SoCalGas continues to face difficulties in aligning Beyond-the-Meter (BTM) construction with To-the-Meter (TTM) completion, which is essential for maintaining project momentum and customer readiness. Achieving BTM completion within 30 days of TTM construction has proven challenging due to:
 - Scheduling conflicts and limited resource availability among BTM contractors.
 - Timing of HCD inspections and the need for re-inspections.
 - Site-specific access constraints and resident coordination.

These factors have resulted in gaps between TTM energization and BTM readiness, affecting overall conversion timelines and customer experience. In addition, consistent delays by BTM contractors in submitting final reimbursement invoices have postponed SoCalGas' financial closeout of completed projects for several months. As a result, administrative closeout is extended even after construction, inspections, and customer cutovers are complete.

6. Cost Assessment

In 2025, the Mobilehome Park Utility Conversion Program operated within a complex cost environment while continuing to deliver strong results. Existing contractor agreements were extended through the year, providing continuity and stable pricing while the next competitive RFP is scheduled for 2026. Earlier phases of the program prioritized smaller mobilehome parks to meet annual conversion targets; however, in 2025, the focus shifted to larger conversion projects. The mobilehome parks that began construction during the year averaged approximately 96 spaces, representing a significant increase in scale compared to prior years. While this shift addressed program goals, it also introduced additional complexity in project coordination and resource allocation.

Gas-only projects continued to represent a notable portion of the portfolio. Unlike joint utility conversions, these projects do not benefit from cost-sharing arrangements, further contributing to higher per-space costs. To mitigate some of these pressures, SoCalGas continued leveraging internal construction crews for gas-only projects. Additionally, the

program strengthened its project management and cost control capabilities, improving forecasting accuracy and reducing variances between estimates and actual costs. In addition to these operational factors, 2025 included a high number of project closeouts driven by the timing of final cost-reconciliation activity. Several multi-year projects completed construction and invoicing during the year, while others finished reconciliation once pending BTM invoices were received. As these items were processed, more spending was recorded in 2025, reflecting the timing of reconciling items from earlier periods, and as a result, SoCalGas exceeded the soft cost cap of \$42 million⁹.

Looking ahead to 2026, several cost factors are anticipated as the program enters its next phase. The upcoming RFP will establish new contractor agreements and updated pricing structures. While competitive sourcing is expected to support cost effectiveness for ratepayers, broader industry trends—including rising labor and material costs—may place upward pressure on future expenditures. Coordination with electric utilities and union requirements will continue to shape the pool of jointly approved TTM contractors, which may influence pricing and scheduling. SoCalGas will work closely with joint utility partners to maintain fair and competitive outcomes.

Material cost escalation, driven by global supply chain factors and economic conditions, remains a consideration for 2026. Combined with anticipated labor rate increases, these factors underscore the importance of ongoing cost management strategies.

7. Program Assessment

2025 marked the midpoint of the ten-year Mobilehome Park (MHP) Utility Conversion Program and the start of its second half. To date, SoCalGas has converted 468 mobilehome parks (amounting to 35,547 permitted spaces), representing approximately 28% of eligible spaces within its service territory. This progress reflects steady advancement toward the Commission's goal of converting 50% of master-metered spaces by 2030.

Building on progress to date, SoCalGas is prioritizing outreach and scheduling efforts based on the updated prioritization list issued by the Safety and Enforcement Division (SED) in July 2025. Cost management remains critical as new contractor agreements under the 2026 RFP process take effect amid rising labor and material costs. To maintain program efficiency and cost-effectiveness, SoCalGas will continue to strengthen coordination with joint utilities, expand contractor participation, and apply rigorous oversight. These efforts will also support alignment with the Electrification Pilot Initiative ordered by the Commission in D.25-11-009 in late 2025.

Performance indicators for 2025 are summarized below.

⁹ D.20-04-004 at 114.

8. Program Penetration

SoCalGas has continued to successfully partner with MHP Owners and Operators, and as of December 31, 2025, has completed conversions for approximately 28% of all eligible mobilehome spaces within its service territory. In 2025, a total of 68 projects were financially closed, contributing to an improved annual space conversion rate of 2.74%, up from 2.54% at the end of 2024. This year-over-year increase brings performance closer to the 3.33% annual target and helps recover ground from prior years with lower conversion volumes. The continued improvement strengthens the program's overall trajectory and supports long-term progress toward SoCalGas' conversion goal.

9. Safety Performance

In 2025, SoCalGas reinforced its commitment to safety by recording zero reportable incidents among employees and three reportable incidents involving TTM contractors. This performance was achieved across 66 construction projects during the year, representing significant collaboration between TTM contractors and SoCalGas' internal workforce.

10. Customer Satisfaction

In response to customer satisfaction surveys in 2025, SoCalGas achieved a satisfaction rate of 81% with MHP residents and 100% with MHP owners/operators related to the overall conversion program.

11. Conclusion

This concludes the 2026 annual filing in accordance with SED's instructions.

Additional Program information can be found online on SoCalGas' website at: [The Mobilehome Park Utility Conversion Program | SoCalGas](#)

This annual report may be accessed at: <https://www.socalgas.com/regulatory/A17-05-007>.¹⁰

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

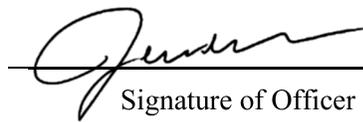


**Mobilehome Park Utility Upgrade Program
Management Certification**

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: 1/1/2025 to 12/31/2025
Start Date End Date


Signature of Officer Executed on: 2/2/2026
Month, Day, Year

Jennifer L. Walker VP Gas Distribution
Print Name Title

SoCalGas 2026 Annual Report List of Active Parks

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		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		ORANGE		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		ORANGE		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		ORANGE		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		SANTA BARBARA		SoCalGas	Gas Only
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		SANTA BARBARA		SoCalGas	Gas Only
		Financially Complete*		SAN BERNARDINO		SoCalGas	PG&E
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		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*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	Gas Only
		Financially Complete*		SANTA BARBARA		SoCalGas	PG&E
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		ORANGE		SoCalGas	SDG&E
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		SAN BERNARDINO		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*		SAN BERNARDINO		SoCalGas	Gas Only
		Financially Complete*		KINGS		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		SANTA BARBARA		SoCalGas	Gas Only
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		ORANGE		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	Gas Only
		Financially Complete*		ORANGE		SoCalGas	Gas Only
		Financially Complete*		VENTURA		SoCalGas	SCE
		Financially Complete*		SANTA BARBARA		SoCalGas	PG&E
		Financially Complete*		SAN BERNARDINO		SoCalGas	Gas Only
		Financially Complete*		ORANGE		SoCalGas	SCE
		Financially Complete*		TULARE		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	Gas Only
		Financially Complete*		ORANGE		SoCalGas	SCE
		Financially Complete*		SAN BERNARDINO		SoCalGas	Gas Only
		Financially Complete*		VENTURA		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	Gas Only
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	Gas Only
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		ORANGE		SoCalGas	SCE
		Financially Complete*		TULARE		SoCalGas	Gas Only
		Financially Complete*		RIVERSIDE		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	Gas Only
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	Gas Only
		Financially Complete*		ORANGE		SoCalGas	Gas Only
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		LOS ANGELES		SoCalGas	SCE
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially Complete*		SAN BERNARDINO		SoCalGas	SCE

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		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SDG&E
		Financially Complete*		VENTURA		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	Gas Only
		Financially Complete*		TULARE		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		TULARE		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		IMPERIAL		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	Gas Only
		Financially Complete*		RIVERSIDE		oCalGas	Gas Only
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		TULARE		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		IMPERIAL		oCalGas	Gas Only
		Financially Complete*		TULARE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		VENTURA		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		VENTURA		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		SAN LUIS OBISPO		oCalGas	PG&E
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		SAN LUIS OBISPO		oCalGas	Gas Only
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		TULARE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE

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		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		IMPERIAL		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		KERN		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		SANTA BARBARA		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	Gas Only
		Financially Complete*		SANTA BARBARA		oCalGas	Gas Only
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
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		Financially Complete*		VENTURA		oCalGas	PG&E
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		ORANGE		oCalGas	Gas Only
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		SAN BERNARDINO		oCalGas	SCE
		Financially Complete*		VENTURA		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	SCE
		Financially Complete*		VENTURA		oCalGas	SCE
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		Financially Complete*		VENTURA		oCalGas	Gas Only
		Financially Complete*		RIVERSIDE		oCalGas	SCE
		Financially Complete*		LOS ANGELES		oCalGas	Gas Only
		Financially Complete*		RIVERSIDE		oCalGas	Gas Only
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		Financially Complete*		RIVERSIDE		oCalGas	Gas Only
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		Construction Complete**		KINGS		oCalGas	SCE
		In Progress***		ORANGE		oCalGas	SCE
		In Progress***		VENTURA		oCalGas	SCE
		In Progress***		SANTA BARBARA		oCalGas	PG&E
		In Progress***		SAN BERNARDINO		oCalGas	SCE
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		In Progress***		ORANGE		oCalGas	SCE
		In Progress***		VENTURA		oCalGas	Gas Only
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