



*Pacific Gas and  
Electric Company*<sup>®</sup>



## Mobile Home Park Utility Upgrade Program 2021 CPUC Report

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**PUBLIC VERSION**

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PACIFIC GAS AND ELECTRIC COMPANY  
MOBILE HOME PARK UTILITY UPGRADE PROGRAM  
2021 CPUC REPORT

TABLE OF CONTENTS

A. Mobile Home Park Utility Program Overview ..... 1

    1. Executive Summary ..... 1

    2. Procedural History ..... 1

    3. Program Vision ..... 2

    4. Report Objectives ..... 2

    5. Program Timeline and Current Progress ..... 2

    6. Cost Assessment ..... 4

B. Conclusion ..... 4

Attachment 1: Annual Report Template.....Atch1-1

Attachment 2: Mobile Home Park List.....Atch2-1

Attachment 3: Officer Verification.....Atch3-1

## **A. Mobile Home Park Utility Program Overview**

### **1. Executive Summary**

On March 14, 2014, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 14-03-021 to approve a 3-year “Living Pilot” (Pilot) Program focusing on converting 10 percent of mobile home park (MHP) spaces in California from master-meter service to direct utility service.

The primary purpose of the Pilot Program is to replace mobile home park (MHP)-owned and operated utility systems with direct public utility gas and electric service for MHP residents. Eight utilities, including Pacific Gas and Electric Company (PG&E), were required to participate beginning January 1, 2015, to implement the CPUC Decision.

On April 16, 2020, the Commission approved a 10-year MHP Utility Conversion Program, beginning in 2021.

### **2. Procedural History**

- 3-year Pilot Program started January 2015.
- Construction targeted to be complete by December 2017; however, per D.14-03-021, utilities were originally allowed to complete the 3-year Pilot Program in 2018, provided construction had started in 2017.
- The CPUC subsequently approved PG&E’s Advice Letters 3822-G/5033-E and 3822-G-A/5033-E-A in Resolution E-4878 that allows PG&E to continue its MHP Pilot until the earlier date 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 years 2018 and 2019 may not exceed the levels specified in the utility’s respective advice letter filings.
- On March 18, 2019, Energy Division issued a subsequent resolution E-4958, authorizing all participating electric and gas utilities to continue their MHP Pilot until the earlier date 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.
- The number of spaces converted in year 2020 and 2021 may not exceed 3.33% of the master metered spaces in a utility’s service territory.

- Initial applications were prioritized by the CPUC and the Department of Housing and Community Development (HCD).
- PG&E must provide outreach to customers and other utilities and share trenches where possible.
- On April 16, 2020, the CPUC approved Decision 20-04-004, establishing a 10-year MHP Utility Conversion Program beginning in 2021 that primarily relies on existing pilot program requirements but makes certain adjustments to eligibility, annual target conversion rates and cost targets.

### **3. Program Vision**

Working with the CPUC's Safety Enforcement Division (SED) and the HCD, PG&E will provide safe, reliable and clean energy for MHP residents.

### **4. Report Objectives**

In compliance with the directives set forth by SED's January 7, 2019 email regarding this report, this seventh status report includes:

- Data in Excel template provided by SED;
- An updated narrative program assessment; and
- An updated list of all MHP conversions completed, and those in progress, including the city and county, space count, gas utility company, and electric utility company performing each conversion.

### **5. Program Timeline and Current Progress**

With the MHP Utility Upgrade Program transitioning to a 10-year program, PG&E has yet to develop a complete schedule for the next phase of MHP projects as PG&E is still in the process of conducting outreach and collecting applications with the new priority list of MHPs.

PG&E and other utilities have received a new list of MHPs as part of the next phase of the MHP Utility conversion program and are in the process of outreach, collecting applications from MHP Owners, as well as coordinating with other IOUs on MHPs with different gas and electric service providers.

Though PG&E has resumed construction after deferring work as a result of the COVID-19 pandemic, the pace of construction has not resumed to pre-pandemic levels due to incremental safety measures implemented to help prevent the spread of the disease. Furthermore, PG&E is impacted by global

supply chain that have made materials more expensive and difficult to procure; this has led to further delays.

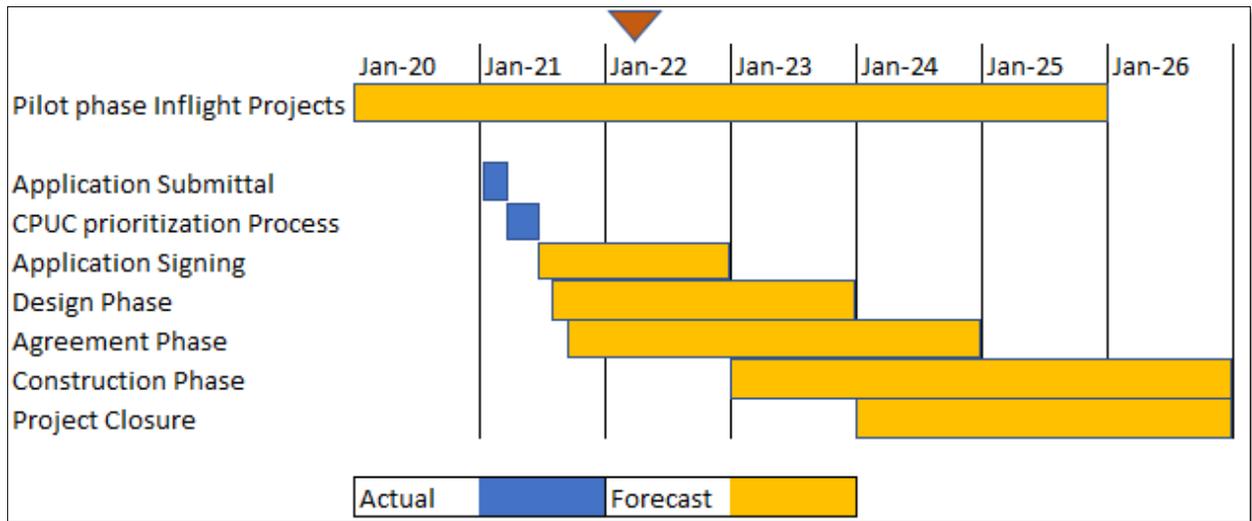
As of December 31, 2021, PG&E has completed 135 MHP projects(10,303 permitted spaces), which is approximately 10 percent of eligible mobile home spaces within PG&E's service territory.

PG&E has measured its progress against the timeline shown in Figure 1, below, based on existing portfolio of projects.

A number of assumptions are inherent in the schedule. Specifically, the schedule assumes that there are no constraints which may prevent the 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 the Decision 20-04-004 and (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.

Furthermore, the schedule is 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 as Agreements are signed and MHPs opt to or decline to participate.

**FIGURE 1  
TIMELINE FOR IMPLEMENTATION OF THE MHP UTILITY UPGRADE PROGRAM FROM 2020 - 2026**



## 6. Cost Assessment

Attachment 1 (“Annual Report Template”) reflects the space counts and costs of projects through December 31, 2021. Classification of costs within each category are defined within the table, which was developed with SED and the IOUs. These costs should be considered final, with the notation that there may be additional trailing costs.<sup>1</sup> The revenue requirements and rate impacts have not been updated since 2019, for the ratepayer impact numbers would not be significantly different and the effort to update does not seem worth the insight provided. PG&E will provide an updated Rate Impact table upon request.

## B. Conclusion

For further project and program detail regarding projects completed by December 31, 2021, PG&E will be submitting further project and program detail regarding projects completed by 12/31/2021 in Track 2 of the 2023 GRC proceeding on July 22, 2022. PG&E will be providing program and project details regarding projects completed after December 31, 2021, in its 2023 GRC as part of the

<sup>1</sup> “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.

program's reasonableness review in accordance with Ordering Paragraph 8 of D.14-03-021.

This concludes the Seventh annual filing in accordance with Ordering Paragraph 10 of D.14-03-021.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**ATTACHMENT 1**  
**ANNUAL REPORT TEMPLATE**

Annual Report Template*		2015	2016	2017	2018	2019	2020	2021
Descriptor		Pre-year costs; not cumulative						
<b>Program Participation</b>								
CARE/FEBA enrollment	Number of individuals enrolled in CARE/FEBA after the conversion	0	112 Customers	378 Customers	1,331 Customers	343 Customers	689 Customers	535 Customers
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	0	13 Customers	100 Customers	69 Customers	53 Customers	85 Customers	30 Customers
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 535 map.	0	77	139	1,395	137	618	643
Rural Community**	Number of converted spaces within rural community	0	49	26	27	1,248	0	0
Urban Community**	Number of converted spaces within urban community	0	211	974	3,342	2,465	846	945
Leak Survey (Optional)	Number of leak surveys identified during preconstruction activity (if known) <i>Note: gas leak figures are revised from previous report. P&amp;E previously reported the total quantity of leaks identified in program. The quantity of leaks repaired in this report are those that are financially closed out of scope.</i>	0	33	90	370	246	38	123
<b>Completed Spaces</b>								
Number of TTM MH and Covered Common Area Locations Converted (Obs)								
		0	265	890	3,054	3,535	1,157	897
Number of TTM MH and Covered Common Area Locations Converted (Electric)								
		0	167	844	2,903	3,114	1,112	809
Number of BTM MH Converted Register Spaces (Gas)								
		0	261	856	2,687	3,533	1,097	897
Number of BTM MH Converted Register Spaces (Electric)								
		0	167	818	2,633	2,979	1,046	809
<b>To The Meter - Capital Costs</b>								
<b>Construction Direct Costs</b>								
City/financing	To the Meter Construction costs for civil related activities	\$ -	\$ 3,402,261.58	\$ 14,261,393.38	\$ 14,193,476.49	\$ 35,766,732.30	\$ 7,038,078.57	\$ 4,746,417.04
Electric	Gas	\$ -	\$ 5,972,206.67	\$ 17,859,209.24	\$ 15,528,086.25	\$ 21,195,180.02	\$ 6,787,542.09	\$ 5,080,396.31
Gas System	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)	\$ -	\$ 56,492,781.80	\$ 56,492,781.80	\$ 5,206,706.30	\$ 9,957,284.86	\$ 2,467,636.12	\$ 1,846,896.93
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	\$ -	\$ 5564,022.42	\$ 1,874,845.76	\$ 2,000,887.06	\$ 3,055,170.74	\$ 712,550.84	\$ 533,336.01
Electric System	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	\$ -	\$ 1,858,374.37	\$ 77,899,819.69	\$ 7,537,033.28	\$ 8,449,432.53	\$ 3,838,858.59	\$ 2,592,427.95
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	\$ -	\$ 8857,942.19	\$ 3,596,269.43	\$ 4,340,546.01	\$ 7,164,328.18	\$ 1,772,257.94	\$ 1,196,827.37
Design/Construction Management	Cost for engineering, design and construction inspection cost	\$ -	\$ 1,960,040.89	\$ 61,506,135.88	\$ 7,137,839.19	\$ 14,245,827.21	\$ 4,264,301.71	\$ 3,103,917.48

Annual Report Template*		Per-year costs; not cumulative					2021
Descriptor	2015	2016	2017	2018	2019	2020	2021
Other							
Meter installation, gas rights, assessments, environmental desktop research and other support	\$ -	\$ 198,175.99	\$ 862,970.23	\$ 280,263.39	\$ 677,730.30	\$ 220,405.93	\$ 129,001.28
Permits obtained internally	\$ -	\$ 510,238.94	\$ 543,572.68	\$ 18,077.94	\$ 90,041.52	\$ 6,130.06	\$ 13,702.62
Materials	\$ -	\$ 1,07,178.30	\$ 448,543.79	\$ 460,755.39	\$ 599,760.87	\$ 192,637.59	\$ 4,916.80
Other Labor (Internal)***	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
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 cost that are not comparable with others.							
<b>Program - Capital Costs</b>							
Project Management Costs							
Project Management Office (PMO)	\$ -	\$ 1,937,185.97	\$ 3,990,039.52	\$ 6,815,257.11	\$ 6,024,153.83	\$ 2,484,048.15	\$ 1,863,482.58
Outreach	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Property tax on capital spending not yet put into service	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
AFUDC	\$ -	\$ 493,360.94	\$ 2,364,110.69	\$ 2,301,853.83	\$ 4,088,537.20	\$ 566,286.58	\$ 733,774.73
Other							
Labor (Internal)***	\$ -	\$ 1,057,759.94	\$ 3,425,193.70	\$ 3,7143.39	\$ 63,729.03	\$ 19,651.56	\$ 50.00
Non-labor	\$ -	\$ 1,157,873.28	\$ 1,765,465.38	\$ 1,785,007.35	\$ 3,348,977.09	\$ 1,313,573.37	\$ 836,499.72
Sub-Total Capital Cost To The Meter - Expense Costs	\$ -	\$ 19,869,697.83	\$ 67,395,195.07	\$ 67,995,780.09	\$ 107,651,536.65	\$ 31,654,307.52	\$ 21,681,276.82
Project Management Office (PMO)							
Program startup cost	\$ -	\$ 1,057,759.94	\$ 3,425,193.70	\$ 3,7143.39	\$ 63,729.03	\$ 19,651.56	\$ 50.00
Outreach	\$ -	\$ 649,881.57	\$ 2,104,419.14	\$ 2,884,933.03	\$ 444,083.10	\$ 149,155.46	\$ 777,663.05
Other							
Labor (Internal)	\$ -	\$ 99,770.21	\$ 323,071.71	\$ 107,281.86	\$ 189,711.04	\$ 56,759.02	\$ 16,354.24
Other Labor (Internal)***	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Design/Construction Management***	\$ -	\$ 524,795.39	\$ 1,699,370.32	\$ 347,019.46	\$ 595,858.92	\$ 183,995.78	\$ (941,623.69)
Non-Labor	\$ -	\$ 285,327.99	\$ 923,937.09	\$ 737,501.14	\$ 1,266,345.06	\$ 390,185.66	\$ -
Cancelled project cost	\$ -	\$ 114,398.93	\$ 370,312.26	\$ 94,992.15	\$ 157,957.45	\$ 48,669.78	\$ 65,844.42
Sub-Total To The Meter	\$ -	\$ 22,601,541.66	\$ 76,201,459.89	\$ 68,938,641.92	\$ 110,403,771.25	\$ 30,502,324.78	\$ 22,649,514.84
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							
Electric System							
Material / Structures	\$ -	\$ 1,416,478.95	\$ 6,019,265.77	\$ 7,110,432.16	\$ 5,898,272.21	\$ 3,398,188.27	\$ 2,154,256.77
Gas System	\$ -	\$ 2,670,634.44	\$ 1,137,368.23	\$ 2,190,119.88	\$ 2,088,492.59	\$ 642,101.33	\$ 407,055.47
Labor	\$ -	\$ 2,533,383.90	\$ 6,914,140.00	\$ 7,585,105.07	\$ 12,008,604.77	\$ 3,441,277.59	\$ 2,121,804.13
Material / Structures	\$ -	\$ 306,601.02	\$ 884,089.85	\$ 1,374,919.12	\$ 19,909,006.41	\$ 415,119.86	\$ 255,964.39
Other	\$ -	\$ 824,921.09	\$ -	\$ 39,334.00	\$ 69,046.00	\$ 707,540.00	\$ 168,954.00
Sub-Total Beyond The Meter	\$ -	\$ 4,807,531.21	\$ 15,747,776.45	\$ 18,652,400.23	\$ 34,525,711.98	\$ 8,104,237.05	\$ 5,107,534.26
Sub-Total TTM & BTM	\$ -	\$ 27,409,233.37	\$ 91,949,236.14	\$ 88,251,542.15	\$ 144,929,483.23	\$ 40,606,561.83	\$ 27,757,049.60
	\$ -	\$ 103,430.07	\$ 103,313.75	\$ 28,897.03	\$ 40,938.34	\$ 35,096.42	\$ 30,944.31

42,588.01

Rate Impact and Revenue Requirement		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Gas	Average Rate w/o MMBA recovery - non CARE	1,496,570 \$	1,471,460 \$	1,596,710 \$	1,516,020 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$	1,602,300 \$
	Average Rate w/ MMBA recovery - non CARE	1,496,660 \$	1,472,710 \$	1,597,840 \$	1,516,870 \$	1,612,440 \$	1,612,390 \$	1,612,390 \$	1,612,390 \$	1,612,420 \$	1,612,010 \$	1,611,950 \$
	Rate Change - non Care	0.000090 \$	0.001250 \$	0.001130 \$	0.002160 \$	0.010140 \$	0.011340 \$	0.010990 \$	0.010590 \$	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 MMBA recovery - Non-Core	NA										
	Average Rate w/ MMBA recovery - Non-Core	NA										
	Rate Change - Non-Core	NA										
	% Rate Change - Non-Core	NA										
	Electric											
	Average Rate w/o MMBA recovery - Total System	0.171752 \$	0.177724 \$	0.187776 \$	0.195340 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$	0.195360 \$
	Average Rate w/ MMBA recovery - Total System	0.171755 \$	0.177742 \$	0.187792 \$	0.194450 \$	0.195676 \$	0.195719 \$	0.195708 \$	0.195694 \$	0.195681 \$	0.195667 \$	0.195654 \$
	Rate Change - Total System	0.000003 \$	0.000038 \$	0.000017 \$	0.000091 \$	0.000316 \$	0.000360 \$	0.000348 \$	0.000335 \$	0.000321 \$	0.000308 \$	0.000294 \$
	% Rate Change - Total System	0.00%	0.02%	0.01%	0.05%	0.16%	0.18%	0.18%	0.17%	0.16%	0.15%	0.15%
	Revenue Requirement											
	Gas Revenue Requirement-TTM	3,008,794 \$	1,949,069 \$	4,012,942 \$	12,653,985 \$	18,276,604 \$	19,562,665 \$	19,192,637 \$	18,609,911 \$	18,026,694 \$	17,463,480 \$	16,916,713 \$
	Electric Revenue Requirement-TTM	2,948,668 \$	1,743,881 \$	3,702,280 \$	13,209,572 \$	18,896,451 \$	20,134,466 \$	19,731,655 \$	19,085,527 \$	18,472,035 \$	17,872,307 \$	17,286,794 \$
	Total Revenue Requirement	5,957,462 \$	3,692,950 \$	7,715,222 \$	25,863,557 \$	37,173,055 \$	39,697,131 \$	38,924,292 \$	37,695,438 \$	36,500,729 \$	35,335,787 \$	34,203,507 \$
	Electric Revenue Requirement-BTM	-	134,950 \$	3,389,210 \$	4,260,109 \$	7,559,878 \$	8,356,823 \$	7,828,868 \$	7,449,831 \$	6,950,295 \$	6,465,597 \$	6,021,152 \$
	Total Revenue Requirement	5,957,462 \$	3,827,900 \$	11,104,432 \$	30,123,666 \$	44,732,933 \$	48,053,954 \$	46,753,160 \$	45,145,269 \$	43,451,024 \$	41,801,384 \$	40,224,659 \$
	Present Value Revenue Requirement											
	Gas Revenue 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 \$
	Electric Revenue 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 \$
	Total Revenue Requirement	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$	226,648,348 \$

\*An appendix can be provided to define each category if needed  
 \*\*The Census Bureau identifies two types of urban areas:  
 •Urbanized Areas (UAs) of 50,000 or more people.  
 •Urban Clusters (UCs) of at least 2,500 and less than 50,000 people.  
 "Urban" refers to population, housing, and territory not included within an urban area. The Census Bureau website is: <https://www.census.gov/geo/reference/urban-rural.html>.  
 \*\*\* 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 the 2021 period and was reallocated in 2022, causing a credit in 2021.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**ATTACHMENT 2**  
**MOBILE HOME PARK LIST**

2021 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	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	PG&E	PG&E	CASTRO VALLEY	ALAMEDA
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	Southern California Gas Company	BAYWOOD PARK	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	ORLAND	GLENN
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	APTOS	SANTA CRUZ
	2			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	1			Conversion Complete	PG&E	PG&E	LOS GATOS	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	GRIDLEY	BUTTE
	2			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	2			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	LOS BANOS	MERCED
	1			Conversion Complete	PG&E	PG&E	ATWATER	MERCED
	1			Conversion Complete	PG&E	PG&E	UNION CITY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	2			Conversion Complete	PG&E	PG&E	CONCORD	CONTRA COSTA
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	1			Conversion Complete	PG&E	PG&E	DAVIS	YOLO
	2			Conversion Complete	PG&E	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	ATWATER	MERCED
	1			Conversion Complete	PG&E	PG&E	WILLITS	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	AMERICAN CANYON	NAPA
	1			Conversion Complete	PG&E	PG&E	HOLLISTER	SAN BENITO
	1			Conversion Complete	PG&E	PG&E	PALERMO	BUTTE
	2			Conversion Complete	PG&E	PG&E	SEBASTOPOLE	SONOMA
	2			Conversion Complete	PG&E	PG&E	MILPITAS	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	COTTONWOOD	SHASTA
	1			Conversion Complete	PG&E	PG&E	HAYWARD	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	LOOMIS	PLACER
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	Southern California Gas Company	ARROYO GRANDE	SAN LUIS OBISPO
	2			Conversion Complete	PG&E	PG&E	GRANITE BAY	PLACER
	1			Conversion Complete	PG&E	PG&E	SEASIDE	MONTEREY
	1			Conversion Complete	PG&E	PG&E	YUBA CITY	SUTTER
	1			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	1			Conversion Complete	PG&E	Southern California Gas Company	ATASCADERO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	PG&E	BENICIA	SOLANO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE

2021 CPUC Annual Report - MHP List

HCDID	Category	Park Name	Space Count	Status	Electric Utility	Gas Utility	City	County
	2			Conversion Complete	SMUD	PG&E	CITRUS HEIGHTS	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	IONE	AMADOR
	2			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	1			Conversion Complete	City of Lake Shasta	PG&E	SUMMIT CITY	SHASTA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	LOCKEFORD	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	CAPITOLA	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	LIVERMORE	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	2			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	HEALDSBURG	SONOMA
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	EAST PALO ALTO	SAN MATEO
	1			Conversion Complete	PG&E	PG&E	SAN LEANDRO	ALAMEDA
	2			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	COTATI	SONOMA
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	RODEO	CONTRA COSTA
	1			Conversion Complete	PG&E	PG&E	ROCKLIN	PLACER
	1			Conversion Complete	PG&E	PG&E	SAN LEANDRO	ALAMEDA
	2			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	PG&E	SCOTT'S VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	BOULDER CREEK	SANTA CRUZ
	1			Conversion Complete	City of Lodi	PG&E	LODI	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	BURNEY	SHASTA
	1			Conversion Complete	PG&E	PG&E	BRISBANE	SAN MATEO
	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	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	SCOTT'S VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	SALINAS	MONTREY
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA

2021 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	MOUNTAIN VIEW	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN PABLO	CONTRA COSTA
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	MARYSVILLE	YUBA
	2			Conversion Complete	PG&E	PG&E	MCKINLEYVILLE	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	ARCATA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	Southern California Gas Company	PASO ROBLES	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	PG&E	IMAXWELL	COLUSA
	1			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	2			Conversion Complete	PG&E	PG&E	VALLEJO	SOLANO
	1			Conversion Complete	PG&E	PG&E	PINEDALE	FRESNO
	1			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	1			Conversion Complete	PG&E	Southern California Gas Company	SAN LUIS OBISPO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	1			Conversion Complete	PG&E	PG&E	CASTRO VALLEY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	2			In Progress	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	Southern California Gas Company	Southern California Gas Company	SANTA BARBARA
	2			Conversion Complete	PG&E	Southern California Gas Company	Southern California Gas Company	SANTA BARBARA
	2			In Progress	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	3			Conversion Complete	PG&E	PG&E	MADERA	MADERA
	3			Conversion Complete	Other/municipal	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	Other/municipal	PG&E	ORANGEVALE	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN

**PACIFIC GAS AND ELECTRIC COMPANY**  
**ATTACHMENT 3**  
**OFFICER VERIFICATION**

VERIFICATION

I, Ahmad Ababneh, 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 San Francisco, California, this 20th day of January 2022.

\_\_\_\_\_/S/\_\_\_\_\_  
Ahmad Ababneh  
Vice President, Electric Operations  
Major Projects & Programs