



**Mobilehome Park Utility Upgrade Program
Annual Report**

PUBLIC VERSION

February 1, 2021

SDG&E MOBILEHOME PARK UTILITY UPGRADE PROGRAM

FEBRUARY 1, 2021 ANNUAL REPORT

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SDG&E MOBILEHOME PARK UTILITY UPGRADE PROGRAM

FEBRUARY 1, 2021 ANNUAL REPORT

1. Executive Summary

As detailed in this Report, SDG&E continues to successfully implement the extended Mobilehome Park Pilot Program. As of December 31, 2020, SDG&E has converted¹ 44 mobilehome neighborhoods (5,124 permitted spaces), which is nearly 15% of the eligible mobilehome spaces within SDG&E's service territory.

2. Procedural History

On March 13, 2014, the California Public Utilities Commission ("Commission") approved and authorized San Diego Gas and Electric Company ("SDG&E") to execute the Mobilehome Park Utility Upgrade Program ("Program") through Decision (D.) 14-03-021 ("Decision"). 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").² SDG&E 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 SDG&E 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.) 18-04-018.³ Eligible MHPs were defined as those where SDG&E and/or MHP owners had incurred "financial obligations" on or before November 1, 2018. Resolution E-4958 further determined the number of spaces converted in each of years 2020 and 2021 may not exceed 3.33% of the total master-metered spaces in a utility's service territory, excluding MHPs that are already under conversion or scheduled for conversion. It further clarified that if a single MHP upgrade would result in the utility exceeding the 3.33% maximum requirement, the utility is authorized to proceed with that upgrade.

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

² Resolution E-4878, ordering paragraph (OP) 7.

³ Resolution E-4958, OP 1.

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

On December 23, 2020, the Commission issued a Phase 2 Scoping Memo to further examine ways to protect residents of participating MHP's from unreasonable rent increase or eviction, and determine whether the development of an electrification ready service standard for participating MHP's was feasible. The Proposed Decision on Consumer Protections is expected around July 2021, with the Proposed Decision on Electrification Standards expected in December 2021.

This report is submitted in the format requested by the Commission's Safety and Enforcement Division ("SED").⁴ Previous reports were submitted in accordance with D.14-03-021OP 10, which directs each electric and/or gas utility to prepare a status report for the Program on February 1 of each year. SDG&E filed its first, second, third, fourth, and fifth status reports on February 1 of 2016, 2017, 2018, 2019, and 2020 respectively. In SDG&E's February 1, 2016 report, SDG&E 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. SDG&E also provided an update on progress made against the timeline for implementation, as well as a preliminary cost assessment and/or cost accounting of to-the-meter ("TTM") and beyond-the-meter ("BTM") construction costs in its February 1, 2017, February 1, 2018, February 1, 2019, and February 1, 2020 reports. This report includes information on the following: (1) a cost accounting for both TTM and BTM construction, and (2) an optional narrative assessment of the Program.

3. Cost Accounting

Table 1 below ("Annual Report Template") reflects the space counts, costs, revenue requirements, and rate impacts of projects through December 31, 2020 for which final costs have been recorded.⁵ Classification of costs within each category are defined within the table,

⁴ 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.

⁵ 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.

which was provided by SED to the IOUs. These costs should be considered final, with the notation that there may be additional trailing costs.⁶ Table 2 below shows the associated revenue requirements and rate impacts.

TABLE 1: ANNUAL REPORT TEMPLATE

- Bolded words in "Descriptor" column were added by SDG&E to clarify the reported data.
- All dollar amounts in Table 1 are rounded to the nearest dollar.

Per the SED instructions accompanying the template, Table 1 costs have been grouped by project and included in the year in which financial closure for each project was completed, with financial closure defined as when all costs have been recorded for a project. Using this methodology has resulted in a shift in reporting year for certain projects where there have been unforeseen issues requiring remediation or trailing costs within the allowable threshold in a year different than previously reported as the year of financial closure.

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
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	-	-	255	1,374	689	455
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	-	-	20	129	116	64
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.	-	-	-	-	-	-
Rural Community ⁷	Number of converted spaces (i.e., PTO count, not directly	-	-	-	-	-	-

⁶ "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.

⁷ The Census Bureau identifies two types of urban areas: (1) Urbanized Areas (UAs) of 50,000 or more people, and (2) Urban Clusters (UCs) 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/programs-surveys/geography/guidance/geo-areas/urban-rural.html>

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
	corresponding with the costs below) within rural community						
Urban Community ⁷	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within urban community	-	-	397	2,725	0	1,010
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	N/A	N/A	N/A	N/A	N/A	N/A
Completed Spaces	Spaces converted that correspond to the project costs reported below (TTM includes common areas). If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.						
Number of TTM MH and Covered Common Area Locations Converted (Gas)		-	-	183	-	3,465	1,838
Number of TTM MH and Covered Common Area Locations Converted (Electric)		-	-	187	-	3,533	2,100
Number of BTM MH Converted Register Spaces (Gas)		-	-	180	-	3408	1,718
Number of BTM MH Converted Register Spaces (Electric)		-	-	180	-	3408	2,016
Cost Information							
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	-	-	-	-	-	
Electric		-	-	787,030	0	14,109,719	10,943,300
Gas		-	-	1,153,053	0	21,420,043	11,715,640

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
	contractor labor and materials)						
Gas System							
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here) (Specific to SDG&E, no gas design costs were previously incorporated in this line item)	-	-	0	0	0	
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	-	-	56,502	0	1,137,093	1,524,616
Electric System							
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here) (Specific to SDG&E, no gas design costs were previously incorporated in this line item)	-	-	0	0	0	
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	-	-	120,459	0	1,440,507	1,632,090
Design/Construction Management	Cost for engineering, design and construction inspection cost	-	-	612,240	0	9,836,297	3,754,893
Other							
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations, including legacy system decommissioning internal labor	-	-	3,883	0	80,226	26,993
Other Labor (Internal)		N/A	N/A				
Non-Labor	Permits, vehicle utilization, consultant support (e.g., environmental monitoring)	-	-	55,909	0	1,254,490	510,301
Materials	meters, modules and regulators	-	-	62,328	0	1,054,996	662,328

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
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)	-	-	221,046	0	4,098,822	2,699,394
Outreach		-	-	0	0	0	
Other				13438.28	0	363859.63	279298.04
Property Tax	Property tax on capital spending not yet put into service	-	-	32,754	0	1,101,108	705,655
AFUDC	AFUDC is a mechanism in which the utility is allowed to recover the financing cost of its 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.	-	-				
Labor (Internal)		N/A	N/A				
Non-Labor	Utility specific overhead driven by corporate cost model	-	-	575,576	0	7,721,626	7,546,467
Sub-Total Capital Cost		-	-	3,694,219	0	63,618,785	42,000,975
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	-	-	19,212	0	305,536	379,658
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	-	-	61,681	0	995,533	432,098

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
Other							
Labor (Internal)	Program startup cost for supporting organizations, meter removal	-	-	0	0	32,910	26,460
Other Labor (Internal)	Construction management expenses costs (e.g., training, supplies)	-	-	5,077	0	77,944	5,084
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	-	-	12,731	0	389,343	115,900
Sub-Total To The Meter		-	-	98,701	0	1,801,266	959,199
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)	-	-	34,810	0	1,081,236	74,711
Electric System							
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	-	-	463,588	0	5,617,537	4,893,596
Material / Structures		-	-	245,442	0	4,469,835	3,793,005
Gas System							
Labor	Labor and material for installing BTM Gas infrastructure (e.g. houselines, meter protection, foundation)	-	-	324,953	0	4,932,822	3,420,261
Material / Structures		-	-	83,822	0	1,771,695	1,398,776
Other							
Other Labor (Internal)		N/A	N/A				
Other Non Labor	BTM Permits, including HCD fees	-	-	135,988	0	3,799,637	891,218
Sub-Total Beyond The Meter		-	-	1,288,602	0	21,672,762	14,471,566
Total TTM & BTM		-	-	5,081,522	0	87,092,813	57,431,740

TABLE 2: RATE IMPACT AND REVENUE REQUIREMENT

- Rate impact and revenue requirements are reported based on actual revenue requirement filings for 2015-2021 (i.e., not based on year of financial closure); 2022-2026 revenue requirements and rate impacts are forecasted based on actual filings (i.e., not forecasted program costs).
- Regulatory interest is applicable to the entire Master Meter Balancing Account (MMBA) balance which includes both TTM and BTM costs. Since the MMBA does not include subaccounts to separate the TTM and BTM balances, regulatory interest for these components of the MMBA is not available. For purposes of this response, regulatory interest is included in the “Gas Revenue Requirement – TTM” line in this table.
- The Present Value Revenue Requirement was calculated as the sum of 1) actual revenue requirements from 2015-2020 and 2) the Present Value of revenue requirements for 2021-2026 discounted to 2020 nominal dollars using SDG&E's rate of return (7.55%). SDG&E does not typically calculate present value of total revenue requirements for rate-making purposes. Although amortization amounts will be collected in rates over a 12-month period, this exercise assumed simplified collection at year-end
- Revenue requirements are in thousands of dollars.
- Gas rate impact dollar amounts are rounded to the nearest hundred thousandths of a dollar to illustrate a visible rate change.

Rate Impact and Revenue Requirement													
Rate Impact	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	
Gas													
Average Rate w/o MMBA recovery - Core	N/A	\$0.75407	\$0.77261	\$0.65949	\$0.66627	\$1.04484	\$1.08594	\$1.08594	\$1.08594	\$1.08594	\$1.08594	\$1.08594	
Average Rate w/ MMBA recovery - Core	N/A	\$0.75490	\$0.72707	\$0.66139	\$0.67733	\$1.05978	\$1.09673	\$1.10821	\$1.11490	\$1.12002	\$1.12530	\$1.13072	
Rate Change - Core	N/A	\$0.00083	\$0.00093	\$0.00190	\$0.01106	\$0.01494	\$0.01079	\$0.02227	\$0.02896	\$0.03408	\$0.03936	\$0.04478	
% Rate Change - Core	N/A	0.11%	0.13%	0.29%	1.66%	1.43%	1.00%	2.10%	2.70%	3.10%	3.60%	4.10%	
Average Rate w/o MMBA recovery - Non-Core	N/A	\$0.02262	\$0.02427	\$0.02992	\$0.03122	\$0.05073	\$0.05263	\$0.05263	\$0.05263	\$0.05263	\$0.05263	\$0.05263	
Average Rate w/ MMBA recovery - Non-Core	N/A	\$0.02263	\$0.02429	\$0.02998	\$0.03144	\$0.05096	\$0.05290	\$0.05303	\$0.05314	\$0.05322	\$0.05333	\$0.05343	
Rate Change - Non-Core	N/A	\$0.00001	\$0.00001	\$0.00006	\$0.00021	\$0.00023	\$0.00027	\$0.00040	\$0.00050	\$0.00059	\$0.00070	\$0.00080	
% Rate Change - Non-Core	N/A	0.06%	0.05%	0.19%	0.69%	0.45%	0.50%	0.80%	1.00%	1.10%	1.30%	1.50%	
Electric													
Average Rate w/o MMBA recovery - Total System	N/A	\$20.364	\$21.781	\$23.991	\$23.735	\$24.596	\$23.993	\$23.993	\$23.993	\$23.993	\$23.993	\$23.993	
Average Rate w/ MMBA recovery - Total System	N/A	\$20.366	\$21.783	\$23.997	\$23.761	\$24.614	\$24.031	\$24.056	\$24.063	\$24.070	\$24.078	\$24.087	
Rate Change - Total System	N/A	\$0.002	\$0.002	\$0.006	\$0.026	\$0.018	\$0.038	\$0.063	\$0.070	\$0.077	\$0.085	\$0.094	
% Rate Change - Total System	N/A	0.01%	0.01%	0.03%	0.11%	0.07%	0.16%	0.26%	0.29%	0.32%	0.35%	0.39%	
Revenue Requirement (In Millions)													
Gas Revenue Requirement-TTM	\$0.000	\$0.424	\$0.192	\$0.124	\$3.952	\$5.593	\$3.900	\$8.691	\$11.482	\$13.587	\$15.837	\$18.114	\$57.924
Electric Revenue Requirement-TTM	\$0.000	\$0.243	\$0.185	\$0.170	\$2.924	\$4.979	\$4.120	\$6.662	\$7.659	\$8.662	\$9.981	\$11.260	\$39.953
Gas Revenue Requirement-BTM	\$0.000	\$0.000	\$0.299	\$0.863	\$1.827	\$2.207	\$1.781	\$3.118	\$3.883	\$4.493	\$5.037	\$5.630	\$20.956
Electric Revenue Requirement-BTM	\$0.000	\$0.000	\$0.231	\$0.925	\$2.076	\$2.921	\$2.771	\$4.642	\$4.975	\$5.228	\$5.390	\$5.618	\$25.102

4. Program Timeline

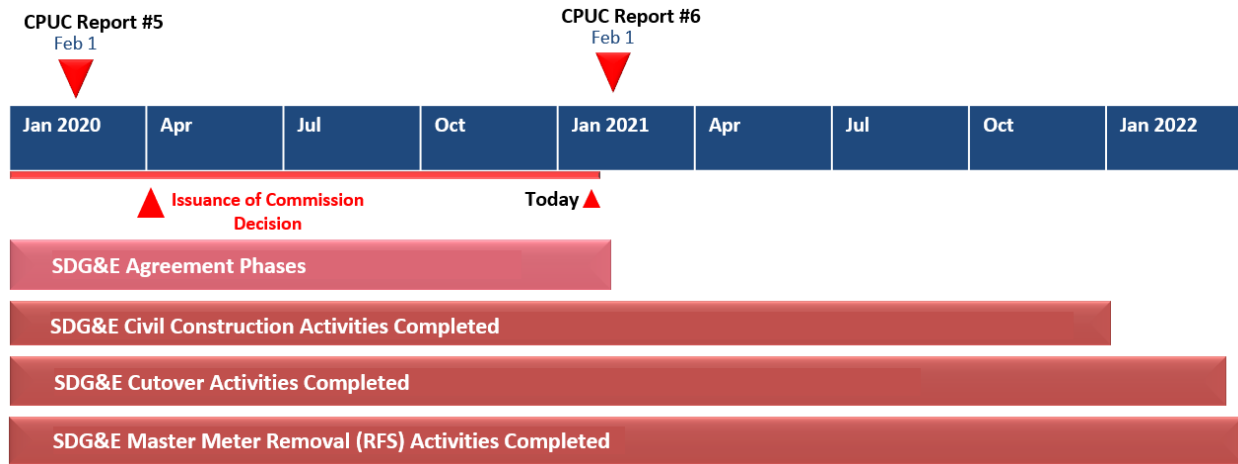
Pursuant to Resolution E-4878, SDG&E planned to achieve its initial Pilot Program target of 10% in 2018 and continue conversion of up to an additional 5% of MHP spaces by December 31, 2019. As of December 31, 2020, SDG&E has converted 44 MHPs (5,124 permitted spaces), which is nearly 15% of eligible the mobilehome spaces within SDG&E's service territory.⁸

SDG&E has measured its progress against the timeline shown in Figure 1 ("SDG&E's Tentative Timeline for Implementation of the Extended Pilot and Current Status") below. In developing the timeline, SDG&E has assumed certain conditions, including, but not limited to, the following: 1) there are no constraints that may delay MHP participation, such as TTM contractor availability or a MHP Owner/Operator's ability to move forward with a project, secure a BTM contractor, or resolve environmental issues; 2) MHP data provided by the MHP Owner/Operator in the Form of Intent ("FOI") and at the beginning of a project is accurate; 3) there are no joint construction schedule constraints for any of the IOUs involved; and 4) the California Department of Housing and Community Development ("HCD") or other Local Enforcement Agencies will have sufficient resources to perform timely inspections on projects.

Pursuant to Resolution E-4958 and the extension limitations set forth therein, SDG&E has substantially completed all eligible MHP upgrades in the fourth quarter of 2020. With the issuance of a Commission Decision for the continuation of the program and the new Form of Intent (FOI) application period between January 1 – March 30, 2021, a new list of eligible parks from SED is needed within the second quarter of 2021 in order to avoid unnecessary costs as a result of delays in outreach, design, and construction activities.

⁸ The scope excludes MHPs that declined to participate in the Program and the corresponding space total was calculated from the MHP's permit-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 Enforcement Division.

FIGURE 1: SDG&E’s Tentative Timeline for Implementation of the Extended Pilot and Current Status



5. Program Assessment

The purpose of implementing the Program was to conduct a pilot during which IOUs and the Commission could assess the feasibility and effectiveness of a mobilehome park conversion program as outlined in the Ordering Paragraphs of D.14-03-021. D.14-03-021, Resolution E-4878 and Resolution E-4958 authorized IOUs to implement the Pilot Program to convert approximately 10%, 5%, and conversion amounts pursuant to the extension limitations contained in Resolution E-4958, respectively, of master-metered/sub-metered services at mobilehome parks to direct utility service.

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

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

Despite the issues faced in 2020, the SDG&E Pilot Program continues to be successful, as noted in Decision 20-04-004 and demonstrated by the following performance indicators:

Program Penetration

SDG&E has successfully partnered with MHP Owners/Operators and, as of December 31, 2020, completed nearly 15% of the eligible mobilehome spaces in SDG&E's service territory.

Safety Performance

From 2014 through 2019, SDG&E maintained a high safety standard with no reportable incidents over approximately 430,000 hours of labor logged between contractors and MHP program employees combined. In 2020, SDG&E continued to maintain a high safety standard with one reportable contractor first-aid incident over approximately 81,000 hours. Additionally, 50 MHPs with systems older than 40 years have received – or are in the process of receiving – new utility-owned and maintained distribution systems that meet current SDG&E standards.

Customer Satisfaction

In response to customer satisfaction surveys through the 3rd quarter of 2020, SDG&E achieved a satisfaction rate of 87% with MHP owners/operators/Managers, and 83% with MHP residents.

6. Conclusion

This concludes the sixth annual filing in accordance with SED's instructions. Additional Program information can be found online on SDG&E's website at <https://www.sdge.com/mobilehome-conversion>.

This annual report may be accessed at: <https://www.sdge.com/regulatory-filing/21081/mobilehome-park-utility-upgrade-program>.⁹

⁹ 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 San Diego Gas & Electric Company (SDG&E), I hereby certify that the Mobilehome Park Utility Upgrade Program Annual Report generated in compliance with D.14-03-021 is accurate.

Reporting Period: January 1, 2020 to December 31, 2020
Start Date End Date

 Executed on: 1/26/2021
Signature of Officer Month, Day, Year

David Buczkowski
Print Name

VP of Gas Distribution
Title

Confidential and Protected Materials (highlighted) are provided pursuant to Public Utilities Code Section 583, General Order 66-D, D.17-09-023, and the accompanying confidentiality declaration.

SDG&E 2021 Annual Report List of Active Parks

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

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

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

HCD ID	NAME	STATUS	CITY	COUNTY	PTO COUNT** *	GAS IOU	ELECTRIC IOU
[REDACTED]	[REDACTED]	Financially complete*	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	Financially complete*	[REDACTED]	SAN DIEGO	[REDACTED]	SoCalGas	SDG&E
[REDACTED]	[REDACTED]	Financially complete*	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SoCalGas	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E
[REDACTED]	[REDACTED]	In progress	[REDACTED]	SAN DIEGO	[REDACTED]	SDG&E	SDG&E

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

**DECLARATION OF LINH-CHI HUA
REGARDING CONFIDENTIALITY OF CERTAIN DATA
PURSUANT TO D.17-09-023**

I, Linh-Chi Hua, do declare as follows:

1. I am the Planning, Construction, and Outreach Manager of the Mobilehome Park Utility Conversion Program for San Diego Gas & Electric (“SDG&E”). I have been delegated authority to sign this declaration by David Buczkowski, Vice President of Gas Distribution. I have reviewed the document titled “SDGE 2021 Annual Rpt – List of Active Parks.xlsx” (the “SDG&E Active Park List”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

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

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

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

Executed this 31st day of January, 2021 at San Diego, California.



Linh-Chi Hua
Planning, Construction, and Outreach Manager
Mobilehome Park Utility Conversion Program

ATTACHMENT A

**SDG&E Request for Confidentiality on the following information contained in
SDG&E Active Park List**

Type and Location of Protected Information	Legal Authority	Narrative Justification
<p>Yellow-highlighted cells in the SDG&E Active Park List</p>	<p>California Public Records Act (CPRA) Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p> <ul style="list-style-type: none"> • Cal. Civil Code § 1798.21 (requiring agencies to "ensure the security and confidentiality of" personal data) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Civil Code §§ 1798.80 <i>et seq.</i> (process for protecting customer records) <p>CPRA Exemption, Gov't Code § 6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy")</p>	<p>The yellow-highlighted cells contain MHP names. This is market-sensitive information that, if revealed, could put the MHP at an unfair business disadvantage because it provides nonpublic information regarding MHP program participation.</p> <p>Disclosure may also constitute an "unwarranted invasion of personal privacy."</p>