



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



## Mobile Home Park Utility Conversion Program 2022 CPUC Report

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**PUBLIC VERSION**

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PACIFIC GAS AND ELECTRIC COMPANY  
MOBILE HOME PARK UTILITY CONVERSION PROGRAM  
2022 CPUC REPORT

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

### **1. Executive Summary**

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

### **2. Procedural History**

- On March 14, 2014, the Commission issued D.14-03-021, approving a three year "Living Pilot" (Pilot) Program to convert 10 percent of MHP spaces in California from master meter service to direct utility service.
- On March 17, 2017, and March 28, 2017, PG&E filed Advice Letters 3822-G/5033-E and 3822-G-A/5033-E-A, respectively. These were subsequently approved in Resolution E-4878, allowing PG&E to continue its MHP Pilot until the earlier of either December 31, 2019, or the issuance of a Commission decision for the continuation, expansion, or modification of the program beyond December 31, 2019. The number of spaces converted in 2018 and 2019 was not to exceed the levels specified in each IOU's respective advice letter filings.
- On March 18, 2019, Resolution E-4958 authorized all participating electric and gas utilities to continue their MHP Pilot until the earlier of either December 31, 2021, or the issuance of a Commission decision for the continuation, expansion, or modification of the program beyond December 31, 2021.
- On April 16, 2020, the Commission issued D.20-04-004, establishing a 10-year MHP Utility Conversion Program, beginning in 2021, which modified certain eligibility, annual target conversion rates, and cost targets from the Pilot.

### **3. Program Vision**

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

### **4. Report Objectives**

Pursuant to D. 20-04-004, PG&E shall annually prepare a report for the Mobilehome Park Utility Conversion Program utilizing the Revised Annual Report Template.<sup>1</sup> This eighth filing is a comprehensive accounting of the 2022 year and includes:

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

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

PG&E has completed its first full year with the MHP UCP in 2022, after transitioning into the 10-year program in 2021. As of December 31, 2022, PG&E has completed 158 MHP projects, which includes 12,991 permitted Mobilehome spaces.

PG&E has measured its progress against the timeline shown in Figure 1, below, based on its existing portfolio of projects. Projects initiated under the Pilot Program are expected to finish in 2027. These are projects started prior to the IOUs (Investor-Owned Utility) receiving new priority lists of MHPs in 2020, as part of D.20-04-004. PG&E has completed the outreach process to the first set of newly prioritized parks. In 2022, the Program is well into the Planning, Agreement, and Design phases of these newly prioritized parks and are expected to be fully completed in 2027. As parks complete construction in 2023, new parks projects will be initiated to ensure the Program remains on pace through 2030.

The schedule assumes that there are no constraints which may prevent an MHP's participation in the Program, such as the MHP owner's ability and

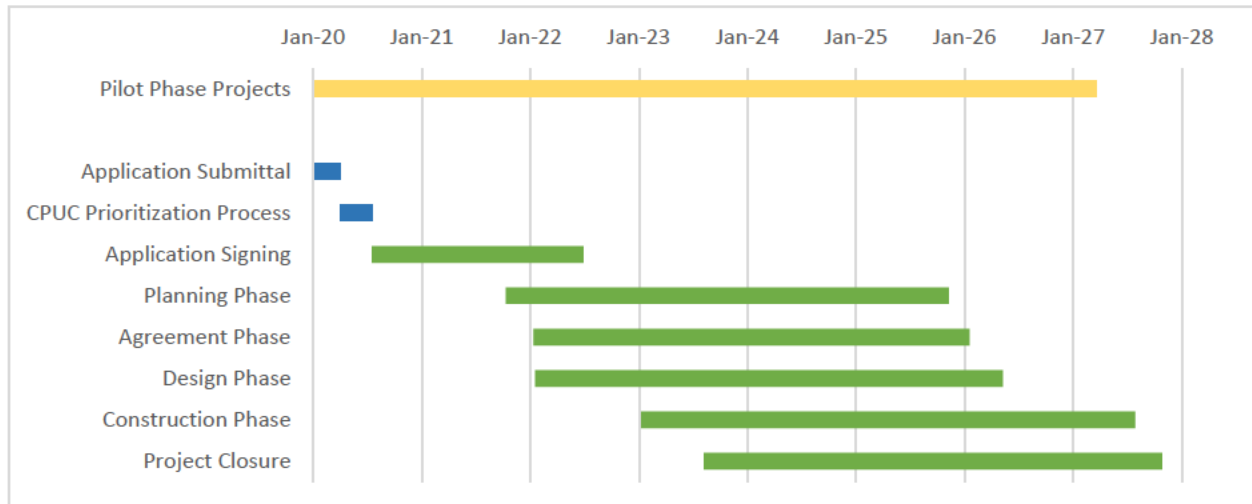
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<sup>1</sup> D.20-04-004, Appendix B, Table 5: New Annual Report Data Template.

willingness to: (1) complete and move forward with a detailed application, (2) execute the Program Agreement, (3) grant the required easements, (4) secure a qualified Beyond-The-Meter (BTM) contractor, (5) finance the BTM construction activities and To-The-Meter (TTM) scope that are not covered under D. 2004004 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.

**FIGURE 1  
MHP UCP IMPLEMENTATION TIMELINE 2020-2028**



PG&E has been significantly impacted by supply chain delays, which have made materials more expensive and difficult to procure. Delivery delays have arisen for many of the Program's frequently used materials, including but not limited to electric pedestals, polyethylene pipe, electric cable, conduit, transformers, and electrical boxes. PG&E has found that lead times are fluctuating often and showing no consistency; there have been instances where lead times have exceeded 52 weeks. In the past, similar materials have had

lead times between four to six weeks. These delays have adversely affected construction schedules. PG&E has collaborated with construction partners by finding alternative sourcing options and by exploring process improvements to encourage the ordering of materials earlier in the conversion timeline, when possible. PG&E has also investigated and approved the usage of alternative models of typical installed assets, such as electric pedestals, to directly address these delays.

On April 19, 2022, the assigned administrative law judge in R.18-04-018 issued a ruling seeking information on the estimated costs of converting and/or upgrading MHPs to different potential electrification ready standards (Ruling).<sup>2</sup> PG&E appreciated the opportunity to respond and provide analysis to create a robust record for the Commission to determine the desirability and development of a service standard and achieve California's objective to reduce greenhouse gas emissions. While PG&E does not have sufficient knowledge of costs and scope related to BTM work as it applies to retrofitting existing coaches for full electrification, PG&E was able to provide actual and estimated costs for three cases<sup>3</sup> outlined in the Ruling.<sup>4</sup> PG&E looks forward to continuing participation in R.18-04-014 and working with the Commission and stakeholder to shape the future of the Program.

This year also marked the end of three-year contracts that PG&E has established with incumbent vendors. Significant effort has been apportioned to collaborating with PG&E's Sourcing Department in a Request for Proposal (RFP) process to renew contract rates and to bring on other competitive vendors. Through this process, it is evident that the cost of labor has risen significantly. Please see Section 7 for details on how PG&E believes this will affect future costs.

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<sup>2</sup> R.18-04-018, Administrative Law Judge's Ruling Seeking Information on Estimated Mobilehome Park Conversion and Upgrade Costs (April 19, 2022).

<sup>3</sup> The Ruling sought actual costs for two recently completed MHP conversions (since July 12021), as well as the estimated cost to serve these recently completed parks assuming the program required a higher electrification standard of 200 amperes (amps). The Ruling also sought cost estimates for converting a common case MHP under the current standards for the MHP Utility Conversion Program as well as a 200-amp electrification ready standard.

<sup>4</sup> Please see Comments of Pacific Gas and Electric Company (U 39 M) to Administrative Law Judge's Ruling Directing Utilities to File Cost Estimate Templates (May 31, 2022) for more details.

## 6. Cost Assessment

Attachment 1 (“Annual Report Template”) reflects the space counts and costs of projects through December 31, 2022. Classification of costs within each category is 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>5</sup>

## 7. Exceeding Soft Cap in 2023 and Beyond

Looking ahead to 2023 and beyond, PG&E notes the increases in cost of labor, that will directly drive an increase in PG&E’s cost per space. Annual inflation rates reached historic highs in 2022<sup>6</sup>, relative to the last twenty years. PG&E has seen these increases reflected in bids submitted by vendors. These price increases will make it increasingly difficult to meet PG&E’s conversion target of 2.5 percent, while remaining under the \$80 million dollar soft cap in the 2023 fiscal year. The increase in parks with smaller space count on the most recent priority list may also drive an increase in costs. Generally, parks with lesser space count cost more as the program benefits from economies of scale. Of the 150 parks PG&E completed by December 31, 2021, 70.7 percent of those parks had an HCD permitted space count of 100 or fewer spaces. 89.7 percent of parks in the newest priority list’s Category 1 fit this criterion.

## B. Conclusion

Pursuant to Ordering Paragraph 8 in D.14-03-021, a reasonableness review of all projects completed in the Program is performed in the General Rate Case (GRC). For further details regarding specific projects from program inception until December 31, 2017, please refer to PG&E’s 2020 GRC.<sup>7</sup> For projects completed between January 1st, 2018, and December 31, 2020, please refer to PG&E’s filing in Track 2 of its 2023 GRC.<sup>8</sup> PG&E will be submitting specific project details for all projects completed in 2021 and 2022 in Track 3 of PG&E’s 2023 GRC.

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5 “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.

6 <https://www.bls.gov/cpi/>

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

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

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



Annual Report Template*		Per-year costs; not cumulative							
Descriptor	2015	2016	2017	2018	2019	2020	2021	2022	
<b>Program Participation</b>									
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion	0	112 Customers	378 Customers	1,331 Customers	343 Customers	689 Customers	525 Customers	752 Customers
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	0	13 Customers	100 Customers	69 Customers	53 Customers	85 Customers	33 Customers	82 Customers
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 535 map.	0	77	139	1,395	137	618	491	543
Rural Community**	Number of converted spaces within rural community	0	49	26	27	1,248	0	0	0
Urban Community**	Number of converted spaces within urban community	0	211	974	3,342	2,465	846	941	1,547
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known) <i>Note: gas leak figures are revised from previous report. PG&amp;E previously reported the total quantity of leaks identified in program. The quantity of leaks reported in this report are those identified at financially closed parks only.</i>	0	33	90	370	246	38	65	143
<b>Completed Spaces</b>									
Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.									
Number of TTM MH and Covered Common Area Locations Converted (Gas)		0	265	890	3,054	3,535	1,168	828	1,567
Number of TTM MH and Covered Common Area Locations Converted (Electric)		0	167	844	2,903	3,114	1,123	695	1,412
Number of BTM MH Converted Register Spaces (Gas)		0	261	856	2,687	3,533	1,108	813	1,547
Number of BTM MH Converted Register Spaces (Electric)		0	167	818	2,633	2,979	1,057	692	1,411
<b>Cost Information</b>									
<b>To The Meter - Capital Costs</b>									
<b>Construction Direct Costs</b>									
Civil/Trenching	To the Meter Construction costs for civil related activities	\$ -	\$ 3,389,445.66	\$ 14,548,355.83	\$ 16,518,576.87	\$ 24,001,697.13	\$ 7,701,185.08	\$ 4,686,453.08	\$ 8,862,748.68
Gas		\$ -	\$ 5,079,659.15	\$ 17,651,853.52	\$ 14,982,685.92	\$ 25,886,529.08	\$ 5,907,771.56	\$ 5,535,325.60	\$ 9,103,189.91
Gas System									
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)	\$ -	\$ 1,846,728.94	\$ 6,417,396.86	\$ 5,447,011.07	\$ 9,411,143.72	\$ 2,147,792.28	\$ 2,012,388.17	\$ 3,309,498.48
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	\$ -	\$ 533,258.63	\$ 1,853,077.72	\$ 1,572,870.60	\$ 2,717,547.49	\$ 620,193.22	\$ 581,094.13	\$ 955,645.73
Electric System									
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	\$ -	\$ 1,851,374.10	\$ 7,946,564.65	\$ 9,022,733.61	\$ 13,110,143.87	\$ 4,206,521.06	\$ 2,559,822.08	\$ 4,840,987.27
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	\$ -	\$ 854,710.42	\$ 3,668,632.73	\$ 4,165,459.83	\$ 6,052,464.81	\$ 1,941,994.00	\$ 1,181,774.45	\$ 2,234,903.40
Design/Construction Management	Cost for engineering, design and construction inspection cost	\$ -	\$ 2,616,623.78	\$ 7,530,961.37	\$ 7,036,462.87	\$ 13,017,033.62	\$ 4,018,563.12	\$ 3,214,477.49	\$ 5,479,495.04
<b>Other</b>									
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations	\$ -	\$ 720,980.74	\$ 1,014,965.12	\$ 758,081.34	\$ 1,368,005.92	\$ 553,509.37	\$ 388,287.16	\$ 881,313.71
Other Labor (Internal)***									
Non-Labor	Permits obtained internally	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Materials	meters, modules and regulators	\$ -	\$ 10,456.92	\$ 459,899.73	\$ 460,755.39	\$ 599,760.87	\$ 194,760.95	\$ 18,074.71	\$ (16,310.77)
<b>Program - Capital Costs</b>									
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.									
<b>Project Management Costs</b>									
Project Management Office (PMO)	Program management office costs (Project Management, Program Management, schedulers, cost analysts and field engineers)	\$ -	\$ 1,034,504.08	\$ 4,187,872.64	\$ 3,275,972.63	\$ 7,807,372.76	\$ 2,564,788.87	\$ 1,989,515.29	\$ 2,482,214.26
<b>Outreach</b>									
Property Tax	Property tax on capital spending not yet put into service	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
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.	\$ -	\$ 493,360.94	\$ 2,363,699.29	\$ 2,301,853.83	\$ 4,071,748.91	\$ 693,184.39	\$ 728,624.16	\$ 1,611,021.97
<b>Other</b>									
Labor (Internal)***									
Non-Labor	Utility specific overhead driven by corporate cost model	\$ -	\$ 1,461,706.86	\$ 2,984,486.28	\$ 2,493,289.60	\$ 4,325,606.40	\$ 1,643,042.79	\$ 980,602.38	\$ 2,463,638.28
<b>Sub-Total Capital Cost</b>									
		\$ -	\$ 19,892,810.21	\$ 70,627,765.73	\$ 68,035,753.56	\$ 112,369,054.58	\$ 32,193,306.68	\$ 23,876,438.70	\$ 42,208,345.97
<b>To The Meter - Expense Costs</b>									
<b>Project Management Costs</b>									
Project Management Office (PMO)****	Program startup cost	\$ 3,589,133.34	\$ 524,994.32	\$ 617,274.79	\$ 766,815.69	\$ 395,054.77	\$ 1,519,983.76	\$ (1,071,120.36)	\$ 105,043.01

Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	\$ 1,464,287.53	\$ 363,662.88	\$ 373,846.31	\$ 278,298.53	\$ 214,408.80	\$ 198,054.17	\$ 419,866.66	\$ 109,782.35
<b>Other</b>									
Labor (Internal)	Program startup cost for supporting organizations	\$ 254,755.50	\$ 104,036.52	\$ 147,629.78	\$ 150,353.89	\$ 76,260.52	\$ 9,730.55	\$ 9,373.37	\$ 5,526.92
Other Labor (Internal)***		\$ 939.98	\$ 281,952.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Design/Construction Management	Training Cost for engineering, design and construction inspection cost	\$ 643,724.95	\$ 1,217,160.73	\$ 418,743.57	\$ 574,565.02	\$ 460,494.64	\$ 235,898.47	\$ 229,496.67	\$ 117,324.62
Non-Labor	Utility specific overhead driven by corporate cost model	\$ -	\$ 381,939.69	\$ 448,445.71	\$ 435,255.87	\$ 284,532.57	\$ 155,381.91	\$ 314,677.26	\$ 102,020.56
Cancelled project cost	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	\$ -	\$ -	\$ 484,671.19	\$ 175,573.00	\$ 101,540.65	\$ 21,505.73	\$ 65,844.42	\$ 92,672.32
<b>Sub-Total To The Meter</b>		<b>\$ 5,952,841.30</b>	<b>\$ 22,766,556.35</b>	<b>\$ 73,118,377.08</b>	<b>\$ 70,416,615.56</b>	<b>\$ 113,901,346.53</b>	<b>\$ 34,333,861.27</b>	<b>\$ 23,844,576.72</b>	<b>\$ 42,740,715.75</b>
<b>Beyond The Meter - Capital</b>	Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and IOU to reimburse per D.14-02-021								
<b>Civil/Trenching</b>	NA								
<b>Electric System</b>									
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter	\$ -	\$ 1,559,073.58	\$ 7,162,254.51	\$ 8,403,547.07	\$ 11,258,308.86	\$ 3,677,832.26	\$ 2,478,150.88	\$ 4,168,932.62
Material / Structures		\$ -	\$ 294,593.21	\$ 1,353,336.76	\$ 1,587,883.98	\$ 2,127,302.68	\$ 694,941.18	\$ 468,256.56	\$ 787,736.57
<b>Gas System</b>									
Labor	Labor and material for installing BTM Gas infrastructure (e.g. houselines, meter	\$ -	\$ 3,108,441.89	\$ 9,264,600.90	\$ 8,170,577.85	\$ 12,506,295.31	\$ 3,735,841.81	\$ 2,479,778.62	\$ 4,611,648.83
Material / Structures		\$ -	\$ 374,970.03	\$ 1,117,584.88	\$ 985,613.34	\$ 1,508,629.10	\$ 450,653.01	\$ 299,134.64	\$ 556,301.24
<b>Other</b>	BTM Permits, including HCD fees								
Other Labor (Internal)***		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Sub-Total Beyond The Meter</b>		<b>\$ -</b>	<b>\$ 5,337,078.71</b>	<b>\$ 18,897,777.05</b>	<b>\$ 19,147,622.24</b>	<b>\$ 27,400,535.95</b>	<b>\$ 8,559,268.26</b>	<b>\$ 5,725,320.70</b>	<b>\$ 10,124,619.26</b>
<b>Total TTM &amp; BTM</b>		<b>\$ 5,952,841.30</b>	<b>\$ 28,103,635.06</b>	<b>\$ 92,016,154.13</b>	<b>\$ 89,564,237.80</b>	<b>\$ 141,301,882.48</b>	<b>\$ 42,893,129.53</b>	<b>\$ 29,569,897.42</b>	<b>\$ 52,865,335.01</b>

**Rate Impact and Revenue Requirement**

Rate Impact	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Present Value Requirement
<b>Gas</b>												
Average Rate w/o MMBA recovery - non CARE	\$ 1.496570	\$ 1.471460	\$ 1.596710	\$ 1.516020	\$ 1.602300	\$ 1.602300	\$ 1.602300	\$ 1.602300	\$ 1.602300	\$ 1.602300	\$ 1.602300	\$ 113,324,174
Average Rate w/ MMBA recovery - non CARE	\$ 1.496660	\$ 1.472710	\$ 1.597840	\$ 1.518670	\$ 1.612440	\$ 1.613640	\$ 1.613290	\$ 1.612850	\$ 1.612430	\$ 1.612010	\$ 1.611590	\$ 115,832,027
Rate Change - non Care	\$ 0.000090	\$ 0.001250	\$ 0.001130	\$ 0.002650	\$ 0.010140	\$ 0.011340	\$ 0.010990	\$ 0.010550	\$ 0.010130	\$ 0.009710	\$ 0.009290	\$ 47,245,987
% 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%	\$ 44,387,743
Average Rate w/o MMBA recovery - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Average Rate w/ MMBA recovery - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Rate Change - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
% Rate Change - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
<b>Electric</b>												
Average Rate w/o MMBA recovery - Total System	\$ 0.171752	\$ 0.177724	\$ 0.187776	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 16,916,713
Average Rate w/ MMBA recovery - Total System	\$ 0.171755	\$ 0.177762	\$ 0.187792	\$ 0.195450	\$ 0.195676	\$ 0.195719	\$ 0.195708	\$ 0.195694	\$ 0.195681	\$ 0.195667	\$ 0.195654	\$ 17,286,794
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	\$ 6,366,759
% Rate Change - Total System	0.00%	0.02%	0.01%	0.05%	0.16%	0.18%	0.18%	0.17%	0.16%	0.16%	0.15%	\$ 6,021,595
<b>Revenue Requirement</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	
Gas Revenue Requirement-TTM	\$ 3,008,794	\$ 1,949,069	\$ 4,012,942	\$ 12,653,985	\$ 18,226,604	\$ 19,562,465	\$ 19,192,637	\$ 18,602,911	\$ 18,026,694	\$ 17,463,480	\$ 16,916,713	\$ 113,324,174
Electric Revenue Requirement-TTM	\$ 2,948,668	\$ 1,743,681	\$ 3,709,280	\$ 13,209,572	\$ 18,896,451	\$ 20,134,466	\$ 19,711,265	\$ 19,084,547	\$ 18,472,035	\$ 17,872,307	\$ 17,286,794	\$ 115,832,027
Gas Revenue Requirement-BTM	\$ -	\$ 147,971	\$ 3,256,959	\$ 5,004,983	\$ 8,150,581	\$ 8,840,665	\$ 8,336,032	\$ 7,843,959	\$ 7,351,553	\$ 6,859,156	\$ 6,366,759	\$ 47,245,987
Electric Revenue Requirement-BTM	\$ -	\$ 134,950	\$ 3,384,210	\$ 4,250,109	\$ 7,559,478	\$ 8,356,323	\$ 7,878,868	\$ 7,414,811	\$ 6,950,399	\$ 6,485,997	\$ 6,021,595	\$ 44,387,743

\*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.

"Rural" encompasses all population, housing, and territory not included within an urban area. The Census Bureau website is:  
<https://www.census.gov/geo/reference/urban-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 2020 and was reallocated in 2021, causing a credit in 2021.

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

2022 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	CASTRO VALLEY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	LIVERMORE	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	SAN LEANDRO	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	SAN LEANDRO	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	CASTRO VALLEY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	HAYWARD	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	UNION CITY	ALAMEDA
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	GRIDLEY	BUTTE
	1			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	1			Conversion Complete	PG&E	PG&E	PALERMO	BUTTE
	1			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	1			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	1			Conversion Complete	PG&E	PG&E	MAXWELL	COLUSA
	1			Conversion Complete	PG&E	PG&E	RODEO	CONTRA COSTA
	1			Conversion Complete	PG&E	PG&E	SAN PABLO	CONTRA COSTA
	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	FRESNO	FRESNO
	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	FRESNO	FRESNO
	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	CLOVIS	FRESNO
	1			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1			Conversion Complete	PG&E	PG&E	PINEDALE	FRESNO
	1			Conversion Complete	PG&E	PG&E	ORLAND	GLENN
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	ARCATA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	EUREKA	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	Southern California Gas Company	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	1			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	WILLITS	MENDOCINO
	1			Conversion Complete	PG&E	PG&E	ATWATER	MERCED
	1			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	1			Conversion Complete	PG&E	PG&E	ATWATER	MERCED
	1			Conversion Complete	PG&E	PG&E	LOS BANOS	MERCED
	1			Conversion Complete	PG&E	PG&E	SEASIDE	MONTEREY
	1			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	1			Conversion Complete	PG&E	PG&E	AMERICAN CANYON	NAPA
	1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	1			Conversion Complete	PG&E	PG&E	ROCKLIN	PLACER
	1			Conversion Complete	PG&E	PG&E	LOOMIS	PLACER
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	1			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO

2022 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	HOLLISTER	SAN BENITO
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	LOCKEFORD	SAN JOAQUIN
	1			Conversion Complete	City of Lodi	PG&E	LODI	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	TRACY	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	1			Conversion Complete	PG&E	Southern California Gas Company	BAYWOOD PARK	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	ATASCADERO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	SAN LUIS OBISPO	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	PASO ROBLES	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	Southern California Gas Company	ARROYO GRANDE	SAN LUIS OBISPO
	1			Conversion Complete	PG&E	PG&E	BRISBANE	SAN MATEO
	1			Conversion Complete	PG&E	PG&E	EAST PALO ALTO	SAN MATEO
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	Southern California Gas Company	SANTA MARIA	SANTA BARBARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	LOS GATOS	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	1			Conversion Complete	PG&E	PG&E	BOULDER CREEK	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SANTA CRUZ	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	APTOS	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SOQUEL	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SCOTTS VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	CAPITOLA	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	SCOTTS VALLEY	SANTA CRUZ
	1			Conversion Complete	PG&E	PG&E	BURNEY	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	City of Lake Shasta	PG&E	SUMMIT CITY	SHASTA
	1			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	1			Conversion Complete	PG&E	PG&E	COTTONWOOD	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	REDDING	SHASTA
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	BENICIA	SOLANO
	1			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLANO
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	COTATI	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA

2022 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	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	HEALDSBURG	SONOMA
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	YUBA CITY	SUTTER
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	DAVIS	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	MARYSVILLE	YUBA
	1			Conversion Complete	PG&E	Southern California Gas Company	LOS ALAMOS	SANTA BARBARA
	2			Conversion Complete	PG&E	PG&E	IONE	AMADOR
	2			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	2			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	2			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	MCKINLEYVILLE	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	2			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	2			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	2			Conversion Complete	PG&E	PG&E	GRANITE BAY	PLACER
	2			Conversion Complete	SMUD	PG&E	CITRUS HEIGHTS	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	SACRAMENTO	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	2			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	2			Conversion Complete	PG&E	PG&E	SEBASTOPOL	SONOMA
	2.1			Conversion Complete	SMUD	PG&E	WEST SACRAMENTO	SACRAMENTO
	2.1			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	Other/municipal	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	3			Conversion Complete	PG&E	PG&E	MADERA	MADERA
	3			Conversion Complete	Other/municipal	PG&E	ORANGEVALE	SACRAMENTO
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	2			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	CONCORD	CONTRA COSTA
	2			Conversion Complete	PG&E	PG&E	VALLEJO	SOLANO
	2			Conversion Complete	PG&E	PG&E	MILPITAS	SANTA CLARA
	3			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	2			Conversion Complete	PG&E	PG&E	PETALUMA	SONOMA
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO

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

**PACIFIC GAS AND ELECTRIC COMPANY**  
**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 Oakland, California, this 23rd day of January 2023.

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