

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

Order Instituting Rulemaking to Evaluate the
Mobilehome Park Pilot Program and to Adopt
Programmatic Modifications.

R.18-04-018

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL MOBILE
HOME PARK UTILITY CONVERSION PROGRAM REPORT
(FOR THE PERIOD JANUARY 1 TO DECEMBER 31, 2022)
IN COMPLIANCE WITH D.20-04-004**

PUBLIC

ANNA VALDBERG
JAMES WHOOLEY

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Rosemead, California 91770
Telephone: (626) 302-1991
E-mail: James.Whooley@sce.com

Dated: February 1, 2023

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(FOR THE PERIOD JANUARY 1 TO DECEMBER 31, 2022)
IN COMPLIANCE WITH D.20-04-004 [PUBLIC]**

Southern California Edison Company (SCE) hereby submits its annual report on the Mobile Home Park (MHP) Utility Conversion Program, which was established to help convert mobilehome parks and manufactured housing communities from master-meter/submeter and master-meter/non-submeter service to direct utility service. SCE’s annual MHP report for the period of January 1, 2022 to December 31, 2022, attached hereto, provides a narrative program assessment (Appendix A), data in the MHP Annual Report Template (Attachment 1) and an updated list of all MHP conversions completed and those in progress, including their city and county, space count, gas utility and electric utility (Attachment 2).

In Decision (D.)20-04-004 (the Decision), approved on April 16, 2020, the Commission authorized a permanent ten-year Mobilehome Park Utility Conversion Program.¹ This decision established new program eligibility requirements, a new prioritization list, and reporting

¹ D.22-12-041.

requirements. MHPs that are currently in progress will be captured under the new reporting requirements.

Ordering Paragraph (OP) 10 of D.20-04-004 states that each electric and/or gas corporation shall annually prepare a report for the Mobilehome Park Utility Conversion Program, as follows: “(a) by February 1 of each year beginning in 2021, and continuing thereafter until the end of the program in 2030 utilizing the Revised Annual Report Template contained in the updated January 2020 Staff Evaluation and as modified by this decision. At the direction of the Commission’s Safety and Enforcement Division (SED), each utility shall file electronic copies of its Annual Report to the service list of this, or successor, proceeding. Utilities shall post copies of their Annual Report on their respective websites and the Commission’s SED shall do the same.”

In accordance with OP 12 of the Decision, SCE’s annual report was verified by an officer of SCE, and the parks completed and in progress list is filed in both confidential and redacted form. Additionally, SCE is providing a list of all the MHP conversions completed in 2022 and in progress within its territory, and is submitting a narrative program assessment along with the data requested in the MHP Annual Report Template.

Respectfully submitted,

ANNA VALDBERG
JAMES WHOOLEY

/s/ James Whooley

By: James Whooley

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Rosemead, California 91770
Telephone: (626) 302-1991
E-mail: James.Whooley@sce.com

February 1, 2023

VERIFICATION

I am an officer of the electric utility submitting this report, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 26, 2023, at Pomona, California.

/s/ Paul Grigaux

By: Paul Grigaux
Vice President of Distribution
SOUTHERN CALIFORNIA EDISON COMPANY
2 Innovation Way
Pomona, California 91768

Appendix A

SCE Mobile Home Park Utility Conversion Program Annual Report

(For the Period January 1 to December 31, 2022) in Compliance with D.20-04-004

1. Executive Summary

On April 16, 2020, the California Public Utilities Commission (CPUC) approved and authorized SCE to execute the Mobilehome Park Utility Conversion Program (MHP Program) through D.20-04-004 (the Decision). This is a ten-year program (2021-2031) for conversion from master-meter/submeter natural gas and/or electric service to direct service and is approved for mobilehome parks and manufactured housing communities (collectively, MHPs) located within the franchise areas of electric and/or natural gas corporations.

2. Background

On March 13, 2014, the CPUC approved and authorized SCE to execute the Mobilehome Park Utility Upgrade Program (Pilot Program) through D.14-03-021. The Pilot Program was a three-year pilot (2015-2017) to convert master-metered/sub-metered electric and gas services to direct utility services for qualified mobilehome parks and manufactured housing communities (collectively MHPs).

Resolution E-4878, issued on September 28, 2017, directed the utilities to continue to “complete all Category 1 MHP conversions as established in D.14-03-021 (approximately 10 percent of the MHP spaces) and work on Category 2 and 3 MHPs until the earlier date of December 31, 2019 or the issuance of a Commission Decision for the continuation, expansion or modification of the program.”²

Resolution E-4958, issued on March 14, 2019, directed the utilities to “continue their Mobile Home Park (MHP) Utility Upgrade Pilot Program 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, 2020 in R.18-04-018, subject to the limitations in OP 2.”³ OP 2 limits eligible MHPs to those for which the utilities and/or MHP owners have incurred financial obligations on or before November 1, 2018.⁴ It further limits the number of eligible spaces to 3.33 percent annually of the total master-metered spaces in a utility’s service territory, unless a single MHP upgrade would exceed the 3.33 percent limit, and sets prioritization criteria for MHP conversions.⁵

On July 1, 2021, the Commission’s Safety and Enforcement Division (SED) published the four-year MHP application prioritization lists. Under certain extenuating circumstances, SED is allowed to adjust the prioritization list on an annual basis not to exceed 3 percent of the total spaces within a utility’s Category 1 population.⁶

² Resolution E-4878, OP 7.

³ Resolution E-4958, OP 1.

⁴ Resolution E-4958, OP 2.a.

⁵ Resolution E-4958, OP 2.b-d.

⁶ D.20-04-004, Pg. 3.

3. Program Implementation

The Pilot Program was planned to achieve the conversion, on a combined to-the-meter (TTM) and beyond-the-meter (BTM) basis, of 10 percent of the estimated MHP spaces in SCE's service territory, which represents approximately 10,800 spaces. Subsequently Resolution E-4878 authorized SCE to convert up to an additional 20 percent of the MHP spaces by December 31, 2019, or the issuance of a Commission Decision to continue, expand or modify the MHP Program.⁷

D.20-04-004 preserves the current MHP annual target conversion rate at 3.33 percent with a cumulative target of converting 50 percent of eligible MHP spaces by 2030 with a priority to maximize conversion of higher risk master-meter/submeter systems that supply natural gas to mobilehome parks or manufactured housing communities and where possible, dual conversions (natural gas and electric) are preferred. The Decision also expands eligibility to include sub-metered and non-sub-metered mobilehomes.

Since inception of the Pilot Program, 60 parks have opted out and SCE has worked with the Commission to identify additional MHPs to participate in the Pilot and MHP Program. SCE noticed a reduction in the overall Program opt out numbers which SCE attributes to the 2021 open application period and parks reapplying. To reach the MHP Program's goal, SCE has developed a robust process to perform the MHP conversions and, where possible, dual conversions (natural gas and electric) have been planned through joint efforts with impacted gas service providers. Additionally, joint trenching opportunities were leveraged with the MHP's existing telecommunications provider(s).

⁷ Resolution E-4878 OP 2 approved SCE's request for continuation of the Pilot MHP Program, as requested in Advice 3576-E. In compliance with the requirements in Resolution E-4878, the Director of the Energy Division approved SCE's Advice Letters 3576-E-A, 3576-E-B on March 9, 2018, with an effective date of October 5, 2017. SCE's advice letters proposed to expand the MHP Program up to an additional 20 percent of MHP spaces.

4. Cost Assessment

From inception of the Pilot Program through December 31, 2022, SCE has converted 268 MHPs with a combined total of 17,648 spaces, including a space count true up in 2018 and 2019. The total conversion cost for these MHPs is \$266,556,765, resulting in a current average per-space cost of \$15,104. SCE considers an MHP to be “converted” after system cutover has occurred, master meter removed, and all financial obligations have been fulfilled. System cutover is defined as all residential spaces that have switched from the park owned legacy electrical system to a direct service SCE electrical system and legacy meter removed or transferred to common area only usage. Construction costs, TTM and BTM, incurred per space are detailed in the attached MHP Annual Report Data Template. Costs may vary depending on multiple factors, including availability of contractors, geographic location, etc.

TTM Costs include the portion paid by SCE for TTM activities, which are shared with other participating utilities where service territories overlap. These costs include trenching and paving, company labor in support of the program including to-the-meter work for selected MHPs, meter installation and master meter removal.

BTM Contractor Costs are reimbursed to the MHP owner/operator or paid to the BTM Contractor to perform the BTM construction work.

In 2022, SCE did not meet its annual cost and space count soft targets due to continued ramp up activities.⁸ These activities included implementation of a new design system, resource ramp up constraints along with an aggressive site walk schedule creating construction delays. However, SCE is implementing continuous improvements across all aspects of the conversion process to ensure the annual cost and space count targets are achievable in 2023 and beyond.

⁸ D.20-04-004, Pg. 116.

5. Program Assessment

The initial purpose of implementing the Pilot Program was to conduct a pilot during which the investor-owned utilities (IOUs) and the Commission could assess the feasibility and effectiveness of a mobilehome park conversion program as outlined in the OPs of D.14-03-021. SCE considers its Pilot Program a success due to the achievement of the following performance indicators listed below and will maintain the use of the same indicators to continue to define success for the 10-year program.

- **Program Participation**

The Pilot Program began on May 22, 2015, when SCE received a list of selected MHPs from the CPUC's SED. Since that time, SCE has successfully partnered with MHP Owners/Operators to increase participation. From inception of the Pilot Program through December 31, 2022, SCE has successfully converted⁹ approximately 17 percent of eligible mobilehome spaces in SCE's service territory (including MHPs converted under both the Pilot and MHP Program).

- **Safety Performance**

In 2022, SCE has maintained a high safety standard with zero (0) reportable TTM contractor incident(s) and zero SCE employee incident(s).

- **Improved Safety and Reliability of MHP Electric Distribution Systems**

MHPs that participated in the program were provided a newly installed distribution system in compliance with current standards of all utility specifications and requirements. This system will provide safer and more reliable service to the MHP residents.

- **Increased Access and Availability to SCE Customer Programs and Services**

Upon conversion of the MHP, residents have immediate access to SCE income-qualified and/or discount customer programs and services, such as California Alternate Rates for Energy (CARE), and Medical Baseline. Residents can also take advantage of time-of-use rates and/or energy efficiency rebates, which can help them save energy and money on their electric bills. Additionally, customers can contact SCE's customer service representatives with billing inquiries or to ask questions regarding other aspects of their utility service. MHP residents can also access SCE's online tools and services to monitor their energy usage directly and discover additional ways to save energy and money.

From January 1, 2022 to December 31, 2022, 681 MHP residents of parks selected for utility upgrade were enrolled in SCE's CARE and FERA programs and 23 were enrolled in SCE's Medical Baseline program.

⁹ SCE understands 2018 conversion percentage reflects SED's direction to define successfully converted as financially complete spaces of the original OIR total. Previous reporting defined successfully converted as cutover complete.

Attachment 1

2022 Mobilehome Park Annual Report Data

2022 MOBILEHOME ANNUAL REPORT		Per-year costs; not cumulative										
Descriptor		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Program Participation												
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the	0	1098	2219	1514	994	1226	547	681			
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion	0	25	61	27	58	65	3	23			
Disadvantaged Community	Number of converted spaces within geographic zones defined by SB 535 map.	0	1185	1707	1250	1245	1297	717	806			
Rural Community**	Number of converted spaces within rural community	0	0	0	0	0	57	0	0			
Urban Community**	Number of converted spaces within urban community	0	1524	4867	3110	2714	2345	1264	1526			
Leak Survey (Optional)	Number of Leaks identified during preconstruction activity (if known)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a			
Completed Spaces	Spaces converted that correspond to the project costs reported below. If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.											
Number of TTM MH and Covered Common Area Locations Converted		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a			
Number of TTM MH and Covered Common Area Locations Converted (Electric)*****		0	1536	4978	3385	2754	2912	1274	1322			
Number of BTM MH Converted Register Spaces (Gas)		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a			
Number of BTM MH Converted Register Spaces (Electric)*****		0	1524	4867	3110	2714	2872	1264	1297			
Cost Information												
To The Meter - Capital Costs												
Construction Direct Costs												
Civil/Trenching			\$ 7,921,647	\$ 20,501,884	\$ 14,982,997	\$ 14,974,404	\$ 12,821,340	\$ 6,670,388	\$ 7,025,891			
Electric	To the Meter Construction costs for civil related activities											
Gas		\$ -										
Gas System		\$ -										
Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here)	\$ -										
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	\$ -										
Electric System												
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated)		\$ 1,351,209	\$ 6,067,599	\$ 3,775,454	\$ 4,892,066	\$ 4,032,268	\$ 2,696,294	\$ 2,498,953			
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction		\$ 866,634	\$ 1,873,516	\$ 1,374,497	\$ 1,678,620	\$ 1,047,198	\$ 862,351	\$ 1,157,353			

2022 MOBILEHOME ANNUAL REPORT		Per-year costs; not cumulative										
	Descriptor	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Design/Construction Management	Cost for engineering, design and construction inspection		\$ 138,704	\$ 187,875	\$ 45,154	\$ 9,632	\$ -	\$ 292	\$ -			
Other												
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations		\$ 43,695	\$ 106,441	\$ 75,296	\$ 108,175	\$ 38,916	\$ 26,170	\$ 21,094			
Other Labor (Internal)**												
Non-Labor	Permits		\$ 2,670	\$ 7,290	\$ 7,569	\$ 481	\$ -	\$ -	\$ -			
Materials	meters, modules and	\$ -	\$ 741,888	\$ 2,404,374	\$ 1,634,955	\$ 1,330,182	\$ 1,435,616	\$ 628,082	\$ 664,966			
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											
Project Management Costs												
Project Management Office (PMO)	Program management office costs (Project Management, Program Management, schedulers, cost analysts and field engineers)	\$ -	\$ -	\$ -	\$ -	\$ -	SCE does not have a dedicated project management office for MHP					
Outreach												
Property Tax	Property tax on capital spending not yet put into 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.		\$ 22,750	\$ 130,601	\$ 92,544	\$ 124,942	\$ 122,975	\$ 48,488	\$ 62,460			
AFUDC			\$ 107,768	\$ 438,055	\$ 350,097	\$ 759,089	\$ 731,579	\$ 291,002	\$ 331,541			
Other												
Labor (Internal)**			\$ 1,469,363	\$ 7,466,856	\$ 4,839,799	\$ 5,179,071	\$ 4,367,699	\$ 2,629,407	\$ 2,466,373			
Non-Labor	Utility specific overhead driven by corporate cost model		\$ 683,128	\$ 2,382,398	\$ 1,593,933	\$ 1,789,482	\$ 1,678,394	\$ 783,790	\$ 906,504			
Sub-Total Capital Cost		\$ -	\$ 13,349,456	\$ 41,566,889	\$ 28,772,295	\$ 30,846,143	\$ 26,275,985	\$ 14,008,182	\$ 14,470,171			
To The Meter - Expense Costs												
Project Management Costs												
Project Management Office	Program startup cost											
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	\$ 43,528	\$ 104,037	\$ 277,056	\$ 71,034	\$ 137,588	\$ 22,838	\$ 52,988	\$ 48,638			
Other												
Labor (Internal)	Program startup cost for supporting organizations	\$ 448,509	\$ 1,343,905	\$ (419,511)	\$ 206,793	\$ 61,288	\$ 35,130	\$ 32,337	\$ 55,078			
Other Labor (Internal)**												
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			
Non-Labor	Other non-labor costs such as tool expenses, mileage and travel	\$ 144,400	\$ 325,478	\$ (153,494)	\$ 21,398	\$ 19,824	\$ 11,462	\$ 4,593	\$ 3,927			
Sub-Total To The Meter		\$ 636,437	\$ 1,773,420	\$ (295,950)	\$ 299,224	\$ 218,700	\$ 69,430	\$ 89,917	\$ 107,643			
Beyond The Meter - Capital												
	Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and PG&E to reimburse per D.14-02-021											

2022 MOBILEHOME ANNUAL REPORT		Per-year costs; not cumulative									
Descriptor	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Civil/Trenching	NA	\$ 1,247,701	\$ 3,862,072	\$ 1,558,531	\$ 819,659	\$ 724,216	\$ 66,369	\$ 99,466			
Electric System											
Labor	Labor and material for	\$ 4,839,743	\$ 19,264,026	\$ 4,850,844	\$ 8,773,769	\$ 4,375,934	\$ 3,517,719	\$ 3,325,729			
Material / Structures	installing BTM Electric	\$ 3,785,345	\$ 13,339,918	\$ 2,782,298	\$ 6,054,074	\$ 2,719,701	\$ 2,241,562	\$ 2,438,358			
Gas System											
Labor	Labor and material for										
Material / Structures	installing BTM Gas										
Other	BTM Permits, including HCD fees	\$ 351,795	\$ 1,413,966	\$ 323,864	\$ 681,721	\$ 351,861	\$ 277,458	\$ 281,124			
Other Labor (Internal)**											
Sub-Total Beyond The Meter		\$ -	\$ 10,224,584	\$ 37,879,982	\$ 9,515,537	\$ 16,329,223	\$ 8,171,711	\$ 6,103,108	\$ 6,144,676		
Total TTM & BTM		\$ 636,437	\$ 25,347,460	\$ 79,150,921	\$ 38,587,057	\$ 47,394,066	\$ 34,517,126	\$ 20,201,207	\$ 20,722,490		

Rate Impact and Revenue Requirement

Rate Impact	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2015 - 2025 Total	Present Value Revenue Requirement
Gas													
Average Rate w/o MMBA recovery - Core	0	0	0	0	0	0	0	0	0	0	0		
Average Rate w/ MMBA recovery - Core	0	0	0	0	0	0	0	0	0	0	0		
Rate Change - Core	0	0	0	0	0	0	0	0	0	0	0		
% Rate Change - Core	0	0	0	0	0	0	0	0	0	0	0		
Average Rate w/o MMBA recovery - Non-Core	0	0	0	0	0	0	0	0	0	0	0		
Average Rate w/ MMBA recovery - Non-Core	0	0	0	0	0	0	0	0	0	0	0		
Rate Change - Non-Core	0	0	0	0	0	0	0	0	0	0	0		
% Rate Change - Non-Core	0	0	0	0	0	0	0	0	0	0	0		
Electric													
Average Rate w/o MMBA recovery - Total System (cents/kWh)	16.2708	14.9154	15.6687	15.9672	15.9033	18.5124	19.9246	24.6857	26.2250	25.1760	26.0410		
Average Rate w/ MMBA recovery - Total System (cents/kWh) ***	16.2716	14.9198	15.6816	15.9889	15.9314	18.5471	19.9662	24.7297	26.2646	25.2130	26.0770		
Rate Change - Total System (cents/kWh)	0.0009	0.0044	0.0129	0.0217	0.0281	0.0347	0.0416	0.0440	0.0395	0.0370	0.0360		
% Rate Change - Total System	0.01%	0.03%	0.08%	0.14%	0.18%	0.19%	0.21%	0.18%	0.15%	0.15%	0.14%		
Revenue Requirement****	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2015 - 2025 Total	Present Value Revenue Requirement
Gas Revenue Requirement-TTM	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electric Revenue Requirement-TTM	694	1,626	5,033	8,253	11,639	14,870	17,598	19,312	19,558	18,989	18,424	135,996	84,856
Gas Revenue Requirement-BTM	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electric Revenue Requirement-BTM	0	946	5,161	8,198	9,992	11,519	12,187	12,609	12,357	11,698	11,039	95,704	61,107

*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.

*** Rate impacts based on SCE's October 1, 2020 authorized bundled system average rate, held constant through 2025 to highlight the incremental impact of MHP on currently known rates

****Review for reasonableness of “to the meter” costs and “beyond the meter costs” recorded in the Mobilehome Park Master Meter Balancing Account (MMBA) will occur in the first General Rate Case (GRC) proceeding where conversion costs are included into GRC rate base for the Mobilehome Parks (MHPs) that have had service cut over completed. The revenue requirement calculation is based on year-end recorded balances and will differ from the revenue requirement recovered in rates (i.e. AL 3539-E, 3715-E) due to timing and modeling differences.

*****Space counts trued up as a result of improvements to recording of data and validation measures.

Attachment 2

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Parks in Progress or Complete - 2022

	A	B	C	D	E	F	G	H	I	J
	Redacted Park #	HCD ID	Park Name	City	County	Number of Spaces	Conversion Type (Natural Gas, Electricity, or Both)	Other Utility Provider	In Progress	Financially Closed
1										
2	1				TULARE	44	Both	SCG	No	Yes
3	2				SAN BERNARDINO	82	Both	SCG	No	Yes
4	3				LOS ANGELES	25	Both	SCG	Yes	No
5	4				SAN BERNARDINO	41	Both	SWG	No	Yes
6	5				SAN BERNARDINO	41	Both	SCG	Yes	No
7	6				LOS ANGELES	25	Both	SCG	No	Yes
8	7				LOS ANGELES	52	Both	SCG	No	Yes
9	8				SAN BERNARDINO	43	Both	SCG	No	Yes
10	9				LOS ANGELES	30	Both	SCG	No	Yes
11	10				LOS ANGELES	42	Both	SCG	No	Yes
12	11				TULARE	79	Both	SCG	Yes	No
13	12				ORANGE	145	Both	SCG	No	Yes
14	13				LOS ANGELES	177	Both	SCG	Yes	No
15	14				VENTURA	79	Both	SCG	No	Yes
16	15				SAN BERNARDINO	96	Both	SWG	No	Yes
17	16				SAN BERNARDINO	35	Both	SWG	Yes	No
18	17				SANTA BARBARA	45	Both	SCG	No	Yes
19	18				LOS ANGELES	102	Both	SCG	No	Yes
20	19				LOS ANGELES	103	Both	SCG	Yes	No
21	20				SAN BERNARDINO	68	Both	SCG	Yes	No
22	21				SAN BERNARDINO	182	Both	SCG	Yes	No
23	22				SAN BERNARDINO	85	Both	SCG	No	Yes
24	23				ORANGE	270	Both	SCG	No	Yes
25	24				ORANGE	90	Both	SCG	No	Yes
26	25				RIVERSIDE	26	Both	SCG	No	Yes
27	26				RIVERSIDE	200	Both	SCG	No	Yes
28	27				KINGS	13	Both	SCG	No	Yes
29	28				LOS ANGELES	33	Both	SCG	No	Yes
30	29				SAN BERNARDINO	109	Both	SCG	No	Yes
31	30				LOS ANGELES	16	Both	SCG	No	Yes
32	31				LOS ANGELES	36	Both	SCG	No	Yes
33	32				LOS ANGELES	73	Both	SCG	No	Yes
34	33				LOS ANGELES	35	Both	SCG	No	Yes
35	34				RIVERSIDE	104	Both	SCG	No	Yes
36	35				TULARE	40	Both	SCG	No	Yes
37	36				LOS ANGELES	47	Both	SCG	No	Yes
38	37				LOS ANGELES	13	Both	SCG	No	Yes
39	38				RIVERSIDE	186	Both	SCG	No	Yes
40	39				LOS ANGELES	101	Both	SCG	Yes	No
41	40				RIVERSIDE	4	Both	SCG	No	Yes
42	41				RIVERSIDE	78	Both	SCG	No	Yes
43	42				RIVERSIDE	308	Both	SCG	Yes	No
44	43				RIVERSIDE	47	Both	SCG	No	Yes
45	44				ORANGE	45	Both	SCG	No	Yes
46	45				ORANGE	74	Both	SCG	Yes	No
47	46				RIVERSIDE	54	Both	SCG	Yes	No
48	47				SAN BERNARDINO	11	Both	SCG	Yes	No
49	48				LOS ANGELES	42	Both	SCG	No	Yes
50	49				ORANGE	97	Both	SCG	Yes	No
51	50				RIVERSIDE	144	Both	SCG	No	Yes
52	51				SAN BERNARDINO	46	Both	SCG	Yes	No
53	52				SAN BERNARDINO	36	Both	SCG	No	Yes
54	53				LOS ANGELES	38	Both	SCG	No	Yes

	A	B	C	D	E	F	G	H	I	J
1	Redacted Park #	HCD ID	Park Name	City	County	Number of Spaces	Conversion Type (Natural Gas, Electricity, or Both)	Other Utility Provider	In Progress	Financially Closed
55	54				LOS ANGELES	79	Both	SCG	No	Yes
56	55				LOS ANGELES	38	Both	SCG	No	Yes
57	56				LOS ANGELES	47	Both	SCG	No	Yes
58	57				SAN BERNARDINO	13	Both	SWG	No	Yes
59	58				LOS ANGELES	13	Both	SCG	No	Yes
60	59				ORANGE	228	Both	SCG	No	Yes
61	60				SAN BERNARDINO	29	Both	SWG	Yes	No
62	61				SAN BERNARDINO	23	Both	SCG	No	Yes
63	62				LOS ANGELES	13	Both	SCG	No	Yes
64	63				RIVERSIDE	30	Both	SCG	No	Yes
65	64				RIVERSIDE	92	Both	SCG	No	Yes
66	65				ORANGE	114	Both	SCG	No	Yes
67	66				SAN BERNARDINO	40	Both	SCG	No	Yes
68	67				VENTURA	27	Both	SCG	No	Yes
69	68				RIVERSIDE	35	Both	SCG	Yes	No
70	69				ORANGE	182	Both	SCG	Yes	No
71	70				ORANGE	289	Both	SCG	Yes	No
72	71				RIVERSIDE	101	Both	SCG	Yes	No
73	72				SAN BERNARDINO	145	Both	SCG	No	Yes
74	73				LOS ANGELES	38	Both	SCG	Yes	No
75	74				RIVERSIDE	44	Both	SCG	No	Yes
76	75				SAN BERNARDINO	78	Both	SCG	No	Yes
77	76				LOS ANGELES	26	Both	SCG	Yes	No
78	77				LOS ANGELES	54	Both	SCG	No	Yes
79	78				KERN	63	Both	SCG	No	Yes
80	79				RIVERSIDE	17	Both	SCG	No	Yes
81	80				SAN BERNARDINO	34	Both	SCG	Yes	No
82	81				LOS ANGELES	56	Both	SCG	No	Yes
83	82				SAN BERNARDINO	16	Both	SCG	No	Yes
84	83				SAN BERNARDINO	50	Both	SWG	No	Yes
85	84				SAN BERNARDINO	26	Both	SWG	Yes	No
86	85				SAN BERNARDINO	58	Both	SWG	No	Yes
87	86				LOS ANGELES	40	Both	SCG	No	Yes
88	87				RIVERSIDE	182	Both	SCG	No	Yes
89	88				LOS ANGELES	33	Both	SCG	No	Yes
90	89				TULARE	25	Both	SCG	No	Yes
91	90				TULARE	34	Both	SCG	No	Yes
92	91				LOS ANGELES	48	Both	SCG	No	Yes
93	92				RIVERSIDE	101	Both	SCG	No	Yes
94	93				RIVERSIDE	72	Both	SCG	No	Yes
95	94				LOS ANGELES	40	Both	SCG	No	Yes
96	95				LOS ANGELES	77	Both	SCG	No	Yes
97	96				LOS ANGELES	75	Both	SCG	No	Yes
98	97				SAN BERNARDINO	49	Both	SCG	No	Yes
99	98				RIVERSIDE	43	Both	SCG	No	Yes
100	99				LOS ANGELES	29	Both	SCG	No	Yes
101	100				SAN BERNARDINO	49	Both	SCG	No	Yes
102	101				TULARE	28	Both	SCG	Yes	No
103	102				SAN BERNARDINO	213	Both	SCG	No	Yes
104	103				SAN BERNARDINO	105	Both	SCG	No	Yes
105	104				LOS ANGELES	39	Both	SCG	No	Yes
106	105				RIVERSIDE	92	Both	SCG	Yes	No
107	106				SAN BERNARDINO	53	Both	SCG	No	Yes

	A	B	C	D	E	F	G	H	I	J
1	Redacted Park #	HCD ID	Park Name	City	County	Number of Spaces	Conversion Type (Natural Gas, Electricity, or Both)	Other Utility Provider	In Progress	Financially Closed
108	107				SAN BERNARDINO	66	Both	SCG	No	Yes
109	108				LOS ANGELES	169	Both	SCG	No	Yes
110	109				KERN	16	Both	SCG	No	Yes
111	110				SAN BERNARDINO	22	Both	SCG	No	Yes
112	111				VENTURA	16	Both	SCG	No	Yes
113	112				LOS ANGELES	193	Both	SCG	No	Yes
114	113				LOS ANGELES	34	Both	SCG	No	Yes
115	114				RIVERSIDE	32	Both	SCG	No	Yes
116	115				LOS ANGELES	34	Both	SCG	No	Yes
117	116				LOS ANGELES	50	Both	SCG	Yes	No
118	117				LOS ANGELES	41	Both	SCG	No	Yes
119	118				LOS ANGELES	144	Both	SCG	No	Yes
120	119				LOS ANGELES	18	Both	SCG	No	Yes
121	120				LOS ANGELES	14	Both	SCG	No	Yes
122	121				LOS ANGELES	24	Both	SCG	No	Yes
123	122				SAN BERNARDINO	68	Both	SWG	No	Yes
124	123				LOS ANGELES	62	Both	SCG	Yes	No
125	124				SAN BERNARDINO	47	Both	SWG	Yes	No
126	125				ORANGE	37	Both	SCG	No	Yes
127	126				LOS ANGELES	24	Both	SCG	No	Yes
128	127				RIVERSIDE	125	Both	SCG	No	Yes
129	128				RIVERSIDE	28	Both	SCG	No	Yes
130	129				LOS ANGELES	24	Both	SCG	No	Yes
131	130				SAN BERNARDINO	46	Both	SCG	No	Yes
132	131				SAN BERNARDINO	31	Both	SWG	No	Yes
133	132				SAN BERNARDINO	71	Both	SCG	No	Yes
134	133				SANTA BARBARA	23	Both	SCG	No	Yes
135	134				TULARE	11	Both	SCG	No	Yes
136	135				ORANGE	306	Both	SCG	No	Yes
137	136				LOS ANGELES	130	Both	SCG	Yes	No
138	137				LOS ANGELES	17	Both	SCG	No	Yes
139	138				SAN BERNARDINO	48	Both	SWG	No	Yes
140	139				LOS ANGELES	27	Both	SCG	No	Yes
141	140				RIVERSIDE	76	Both	SCG	No	Yes
142	141				LOS ANGELES	87	Both	SCG	Yes	No
143	142				LOS ANGELES	40	Both	SCG	No	Yes
144	143				LOS ANGELES	27	Both	SCG	No	Yes
145	144				ORANGE	184	Both	SCG	No	Yes
146	145				RIVERSIDE	52	Both	SCG	No	Yes
147	146				LOS ANGELES	94	Both	SCG	No	Yes
148	147				KERN	43	Both	SCG	No	Yes
149	148				LOS ANGELES	79	Both	SCG	No	Yes
150	149				SAN BERNARDINO	260	Both	SCG	No	Yes
151	150				SAN BERNARDINO	56	Both	SCG	No	Yes
152	151				LOS ANGELES	28	Both	SCG	No	Yes
153	152				SAN BERNARDINO	45	Both	SCG	No	Yes
154	153				VENTURA	41	Both	SCG	No	Yes
155	154				TULARE	25	Both	SCG	No	Yes
156	155				LOS ANGELES	26	Both	SCG	No	Yes
157	156				LOS ANGELES	26	Both	SCG	No	Yes
158	157				SAN BERNARDINO	152	Both	SCG	No	Yes
159	158				SAN BERNARDINO	64	Both	SCG	No	Yes
160	159				RIVERSIDE	165	Both	SCG	No	Yes

	A	B	C	D	E	F	G	H	I	J
	Redacted Park #	HCD ID	Park Name	City	County	Number of Spaces	Conversion Type (Natural Gas, Electricity, or Both)	Other Utility Provider	In Progress	Financially Closed
1										
161	160				LOS ANGELES	66	Both	SCG	No	Yes
162	161				LOS ANGELES	21	Both	SCG	No	Yes
163	162				ORANGE	41	Both	SCG	Yes	No
164	163				LOS ANGELES	45	Both	SCG	No	Yes
165	164				ORANGE	132	Both	SCG	No	Yes
166	165				LOS ANGELES	56	Both	SCG	No	Yes
167	166				LOS ANGELES	23	Both	SCG	No	Yes
168	167				ORANGE	82	Both	SCG	No	Yes
169	168				SAN BERNARDINO	92	Both	SWG	No	Yes
170	169				SAN BERNARDINO	32	Both	SCG	No	Yes
171	170				LOS ANGELES	27	Both	SCG	No	Yes
172	171				SAN BERNARDINO	52	Both	SCG	No	Yes
173	172				SAN BERNARDINO	40	Both	SCG	No	Yes
174	173				SAN BERNARDINO	50	Both	SCG	No	Yes
175	174				RIVERSIDE	12	Both	SCG	Yes	No
176	175				SAN BERNARDINO	104	Both	SWG	No	Yes
177	176				SAN BERNARDINO	44	Both	SCG	Yes	No
178	177				LOS ANGELES	47	Both	SCG	No	Yes
179	178				SAN BERNARDINO	140	Both	SCG	Yes	No
180	179				SAN BERNARDINO	18	Both	SCG	No	Yes
181	180				SAN BERNARDINO	56	Both	SCG	No	Yes
182	181				SAN BERNARDINO	68	Both	SCG	No	Yes
183	182				SAN BERNARDINO	77	Both	SCG	Yes	No
184	183				SAN BERNARDINO	31	Both	SCG	No	Yes
185	184				VENTURA	46	Both	SCG	No	Yes
186	185				TULARE	12	Both	SCG	No	Yes
187	186				LOS ANGELES	54	Both	SCG	No	Yes
188	187				LOS ANGELES	90	Both	SCG	No	Yes
189	188				LOS ANGELES	30	Both	SCG	No	Yes
190	189				ORANGE	67	Both	SCG	No	Yes
191	190				SAN BERNARDINO	32	Both	SCG	Yes	No
192	191				LOS ANGELES	117	Both	SCG	No	Yes
193	192				LOS ANGELES	48	Both	SCG	No	Yes
194	193				SAN BERNARDINO	151	Both	SCG	No	Yes
195	194				SAN BERNARDINO	132	Both	SCG	No	Yes
196	195				LOS ANGELES	17	Both	SCG	Yes	No
197	196				SAN BERNARDINO	45	Both	SCG	Yes	No
198	197				RIVERSIDE	106	Both	SCG	Yes	No
199	198				LOS ANGELES	45	Both	SCG	No	Yes
200	199				LOS ANGELES	197	Both	SCG	No	Yes
201	200				SAN BERNARDINO	45	Both	SCG	No	Yes
202	201				SAN BERNARDINO	97	Both	SCG	No	Yes
203	202				SAN BERNARDINO	137	Both	SCG	No	Yes
204	203				SAN BERNARDINO	51	Both	SCG	No	Yes
205	204				SAN BERNARDINO	71	Both	SCG	No	Yes
206	205				LOS ANGELES	48	Both	SCG	No	Yes
207	206				SAN BERNARDINO	69	Both	SCG	No	Yes
208	207				LOS ANGELES	44	Both	SCG	No	Yes
209	208				SAN BERNARDINO	40	Both	SWG	No	Yes
210	209				LOS ANGELES	30	Both	SCG	Yes	No
211	210				VENTURA	121	Both	SCG	No	Yes
212	211				TULARE	24	Both	SCG	No	Yes
213	212				KERN	57	Both	SCG	Yes	No

	A	B	C	D	E	F	G	H	I	J
1	Redacted Park #	HCD ID	Park Name	City	County	Number of Spaces	Conversion Type (Natural Gas, Electricity, or Both)	Other Utility Provider	In Progress	Financially Closed
214	213				RIVERSIDE	66	Both	SCG	No	Yes
215	214				ORANGE	74	Both	SCG	No	Yes
216	215				RIVERSIDE	48	Both	SCG	No	Yes
217	216				RIVERSIDE	108	Both	SCG	No	Yes
218	217				ORANGE	379	Both	SCG	Yes	No
219	218				SAN BERNARDINO	107	Both	SCG	No	Yes
220	219				ORANGE	229	Both	SCG	No	Yes
221	220				LOS ANGELES	178	Both	SCG	No	Yes
222	221				LOS ANGELES	97	Both	SCG	No	Yes
223	222				LOS ANGELES	104	Both	SCG	No	Yes
224	223				ORANGE	181	Both	SCG	No	Yes
225	224				SAN BERNARDINO	36	Both	SCG	No	Yes
226	225				LOS ANGELES	26	Both	SCG	No	Yes
227	226				SAN BERNARDINO	27	Both	SCG	No	Yes
228	227				RIVERSIDE	72	Both	SCG	No	Yes
229	228				ORANGE	94	Both	SCG	No	Yes
230	229				SAN BERNARDINO	82	Both	SWG	No	Yes
231	230				RIVERSIDE	18	Both	SCG	No	Yes
232	231				RIVERSIDE	80	Both	SCG	No	Yes
233	232				SAN BERNARDINO	59	Both	SCG	No	Yes
234	233				LOS ANGELES	38	Both	SCG	Yes	No
235	234				LOS ANGELES	34	Both	SCG	No	Yes
236	235				LOS ANGELES	23	Both	SCG	No	Yes
237	236				LOS ANGELES	89	Both	SCG	No	Yes
238	237				SAN BERNARDINO	29	Both	SWG	Yes	No
239	238				RIVERSIDE	109	Both	SCG	No	Yes
240	239				SAN BERNARDINO	45	Both	SCG	No	Yes
241	240				SAN BERNARDINO	30	Both	SCG	Yes	No
242	241				RIVERSIDE	45	Both	SCG	No	Yes
243	242				LOS ANGELES	44	Both	SCG	Yes	No
244	243				RIVERSIDE	217	Both	SCG	No	Yes
245	244				SAN BERNARDINO	99	Both	SWG	No	Yes
246	245				SAN BERNARDINO	99	Both	SWG	No	Yes
247	246				SAN BERNARDINO	169	Both	SCG	No	Yes
248	247				SAN BERNARDINO	98	Both	SCG	No	Yes
249	248				LOS ANGELES	20	Both	SCG	No	Yes
250	249				SANTA BARBARA	144	Both	SCG	No	Yes
251	250				ORANGE	185	Both	SCG	No	Yes
252	251				RIVERSIDE	50	Both	SCG	No	Yes
253	252				ORANGE	65	Both	SCG	No	Yes
254	253				TULARE	37	Both	SCG	Yes	No
255	254				SAN BERNARDINO	73	Both	SCG	No	Yes
256	255				TULARE	25	Both	SCG	No	Yes
257	256				LOS ANGELES	46	Both	SCG	No	Yes
258	257				LOS ANGELES	182	Both	SCG	Yes	No
259	258				SAN BERNARDINO	213	Both	SCG	No	Yes
260	259				TULARE	33	Both	SCG	No	Yes
261	260				TULARE	30	Both	SCG	No	Yes
262	261				TULARE	13	Both	SCG	No	Yes
263	262				SAN BERNARDINO	38	Both	SCG	No	Yes
264	263				LOS ANGELES	221	Both	SCG	No	Yes
265	264				ORANGE	96	Both	SCG	No	Yes
266	265				LOS ANGELES	48	Both	SCG	Yes	No

	A	B	C	D	E	F	G	H	I	J
	Redacted Park #	HCD ID	Park Name	City	County	Number of Spaces	Conversion Type (Natural Gas, Electricity, or Both)	Other Utility Provider	In Progress	Financially Closed
1										
267	266				RIVERSIDE	63	Both	SCG	No	Yes
268	267				RIVERSIDE	26	Both	SCG	No	Yes
269	268				SAN BERNARDINO	39	Both	SCG	No	Yes
270	269				LOS ANGELES	248	Both	SCG	Yes	No
271	270				SAN BERNARDINO	24	Both	SCG	No	Yes
272	271				TULARE	40	Both	SCG	No	Yes
273	272				RIVERSIDE	115	Both	SCG	No	Yes
274	273				RIVERSIDE	148	Both	SCG	No	Yes
275	274				VENTURA	139	Both	SCG	No	Yes
276	275				LOS ANGELES	28	Both	SCG	Yes	No
277	276				RIVERSIDE	45	Both	SCG	Yes	No
278	277				LOS ANGELES	27	Both	SCG	No	Yes
279	278				SAN BERNARDINO	30	Both	SWG	No	Yes
280	279				SAN BERNARDINO	25	Both	SWG	No	Yes
281	280				SAN BERNARDINO	37	Both	SCG	No	Yes
282	281				SAN BERNARDINO	96	Both	SCG	No	Yes
283	282				SAN BERNARDINO	120	Both	SCG	No	Yes
284	283				LOS ANGELES	33	Both	SCG	No	Yes
285	284				SAN BERNARDINO	38	Both	SWG	No	Yes
286	285				LOS ANGELES	75	Both	SCG	Yes	No
287	286				RIVERSIDE	130	Both	SCG	Yes	No
288	287				LOS ANGELES	173	Both	SCG	No	Yes
289	288				SAN BERNARDINO	53	Both	SCG	No	Yes
290	289				ORANGE	28	Both	SCG	No	Yes
291	290				RIVERSIDE	72	Both	SCG	No	Yes
292	291				SAN BERNARDINO	161	Both	SCG	No	Yes
293	292				LOS ANGELES	66	Both	SCG	No	Yes
294	293				RIVERSIDE	36	Both	SCG	No	Yes
295	294				LOS ANGELES	19	Both	SCG	No	Yes
296	295				LOS ANGELES	26	Both	SCG	No	Yes
297	296				LOS ANGELES	11	Both	SCG	No	Yes
298	297				SAN BERNARDINO	18	Both	SCG	No	Yes
299	298				LOS ANGELES	90	Both	SCG	No	Yes
300	299				LOS ANGELES	41	Both	SCG	No	Yes
301	300				SAN BERNARDINO	93	Both	SCG	No	Yes
302	301				SAN BERNARDINO	67	Both	SWG	No	Yes
303	302				RIVERSIDE	49	Both	SCG	No	Yes
304	303				SAN BERNARDINO	70	Both	SCG	No	Yes
305	304				LOS ANGELES	90	Both	SCG	No	Yes
306	305				LOS ANGELES	10	Both	SCG	No	Yes
307	306				RIVERSIDE	110	Both	SCG	Yes	No
308	307				SAN BERNARDINO	96	Both	SCG	No	Yes
309	308				LOS ANGELES	60	Both	SCG	No	Yes
310	309				LOS ANGELES	34	Both	SCG	No	Yes
311	310				LOS ANGELES	34	Both	SCG	No	Yes
312	311				TULARE	27	Both	SCG	Yes	No
313	312				RIVERSIDE	81	Both	SCG	No	Yes
314	313				SAN BERNARDINO	63	Both	SCG	No	Yes
315	314				LOS ANGELES	30	Both	SCG	No	Yes
316	315				LOS ANGELES	35	Both	SCG	Yes	No
317	316				VENTURA	24	Both	SCG	No	Yes
318	317				SAN BERNARDINO	44	Both	SCG	No	Yes
319	318				SAN BERNARDINO	43	Both	SCG	No	Yes

	A	B	C	D	E	F	G	H	I	J
	Redacted Park #	HCD ID	Park Name	City	County	Number of Spaces	Conversion Type (Natural Gas, Electricity, or Both)	Other Utility Provider	In Progress	Financially Closed
1										
320	319				LOS ANGELES	61	Both	SCG	No	Yes
321	320				RIVERSIDE	42	Both	SCG	No	Yes
322	321				SAN BERNARDINO	24	Both	SWG	No	Yes
323	322				SAN BERNARDINO	16	Both	SCG	No	Yes
324	323				LOS ANGELES	18	Both	SCG	No	Yes
325	324				LOS ANGELES	31	Both	SCG	No	Yes
326	325				LOS ANGELES	29	Both	SCG	No	Yes
327	326				SAN BERNARDINO	96	Both	SCG	No	Yes

Attachment 3

**Declaration Supporting Confidential Designation on Behalf of Southern California Edison
Company**

**DECLARATION SUPPORTING
CONFIDENTIAL DESIGNATION
ON BEHALF OF
SOUTHERN CALIFORNIA EDISON COMPANY**

1. I, Paul Grigaux, am a/the Vice President of Distribution of Southern California Edison Company (“SCE”), a California corporation, as such I had responsibility for managing the preparation of SCE responses to this data request. My business office is located at:

Southern California Edison

2 Innovation Way,

Pomona, CA 91768

Email: Paul.Grigaux@sce.com
2. I am making this declaration in accordance with the instructions set forth in California Public Utilities Commission (CPUC or Commission) Decision (D.) 19-01-028, D.17-09-023, and General Order (G.O) 66-D Revision 1, which governs the submission of confidential documents to the Commission.
3. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.
4. This declaration applies to the document R1804018-CONFIDENTIAL - Parks in Progress or Complete-2022, attached to the Southern California Edison Company’s Annual Mobile Home Park Utility Conversion Program Report.
5. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents [page number, section, or field or portion that is confidential]
<input type="checkbox"/>	<p>Customer-specific data, customer energy usage, demand, demand reduction, loads, amounts of savings, billing data, customer financial information, customer credit ratings.</p> <p>Protected under PUC Code § 8380, Civ. Code §§1798 <i>et seq.</i>, Gov't. Code §6254[c]; Decisions (D.) 14-05-016, D. 04-08-055, D.06-12-029.</p>	
<input checked="" type="checkbox"/>	<p>Personally Identifiable Information (PII) that identifies or describes an individual (e.g. customer, contractor) which may include home address, phone number; email address, Social Security Numbers and other Government Issued Identification Numbers such as Driver's License, or Passport numbers; education; financial matters; medical or employment history; job title, position, work email address or phone number, statements and identifiers attributed to individual, including: Id's, usernames, passwords -security questions answers and PINS.</p> <p>Gov't Code Section § 6254[c]. <i>See also</i>, Gov't Code §§ 6254(a),(d),(k), 6254.7(d) Protected under Civ. Code §§1798 <i>et seq</i> and 15 U.S.C §§ 1681 <i>et seq</i>, General Order 77-M.</p>	<p>R1804018-CONFIDENTIAL - Parks in Progress or Complete-2022. Xlsx, Columns B, C, D.</p> <p>R1804018-CONFIDENTIAL - Parks in Progress or Complete-2022.pdf, Columns B, C, D.</p>
<input type="checkbox"/>	<p>Personally Identifiable Information (PII) of SCE Employees below the Director position level such as: job title, position, work email address or phone number, education, medical or employment history, statements and identifiers attributed to SCE employee, including: Id's, usernames, passwords - security questions answers and PINS.</p> <p>Protected under civil code section 1798.21, 1798.81.5, 1798.82, 1798.85, 1798.80, 1798.89, 1798.90.1, 1798.98, 1798.99,4326, 1798.3, 1798.24, Evid. Code Section 1060, Cal Const., art I section 1, and G.O. 77-M, HIPAA, HITECH.</p>	
<input type="checkbox"/>	<p>SCE proprietary and trade secret information, intellectual property or competitive data (e.g., org structure/work charts, noncore competitive growth opportunities, pricing forecast, supply and demand forecast,) and other commercial records including project specific calculations, project costs, equipment cost; market-sensitive data; nonpublic business</p>	

plans and strategies; long-term fuel buying and hedging plans; price, load, or demand forecasts; power purchase agreements within three years of execution, etc.

Protected under Govt. Code §§6254(e) (i), (k), 6254.7 (d), 6254.15, 6255(a), 6276.44, Civ. Code §3426 *et seq.*; Evidence Code § 1060.

Corporate financial records and non-public financial information, including Tax Returns, Board Minutes, Non-Public Company Financial Information.

Protected under Gov't Code §6254.15, Gov't Code § 6254 (e), Gov't Code§ 6254.7(d), Evidence Code §1060. SEC Rules 10b-5, 10b-S-1, 10b5-2.

Third-Party (Vendor) information, including vendor proprietary information such as Vendor Bid, Pricing Information and Vendor Proprietary Information subject to non-disclosure or confidentiality agreement, contract between the utility and third-party vendors that contain confidentiality clauses.

(See Gov't Code §§6254(K), 6255(a) See, e.g., D.11-01-036, 2011 WL 660568)

Critical Energy Infrastructure and Cyber (CEII)-and Physical- Security Sensitive Security Information.

18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702, Protected under Gov't Code §§ 6254(e), 6255(a), 6 U.S.C. §132(5), 68 Fed. Reg, 9857

Privileged Attorney-Client Communications, Attorney-Work Product, and Pending Litigation Information (e.g., claims and investigation reports associated with Utility Incidents, Claims Reserve Information, Information related to potential and pending litigation of investigations)

Gov't Code §6254(k), Gov't Code §6276.04, Civil Code §954, Evidence Code § 950 *et seq.*

Other Basis

6. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
7. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
8. Executed on this 26th day of January 2023 at Pomona, California.

DocuSigned by:
Paul Grigaux
FA662BBE90304BB...
Paul Grigaux
VP of Distribution
Southern California Edison
Company