



PUBLIC VERSION

**Mobilehome Park Utility Conversion Program
Annual Report**

February 1, 2024

SDG&E MOBILEHOME PARK UTILITY CONVERSION PROGRAM

FEBRUARY 1, 2024 ANNUAL REPORT

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SDG&E MOBILEHOME PARK UTILITY CONVERSION PROGRAM

FEBRUARY 1, 2024 ANNUAL REPORT

1. Executive Summary

As detailed in this Report, San Diego Gas and Electric (“SDG&E”) continues to successfully implement the Mobilehome Park Utility Conversion Program (“Program”). As of December 31, 2023, SDG&E has converted¹ 79 mobilehome parks (8,514 permitted spaces), which is 34% 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 SDG&E to execute the 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

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.

upgrade would result in the utility exceeding the 3.33% maximum requirement, the utility is authorized to proceed with that upgrade.

On April 16, 2020, the Commission issued Decision 20-04-004, approving a ten-year Mobilehome Park Utility Conversion Program from 2021 through 2030. Following a new application period established by the Commission during the 1st quarter of 2020, the Safety and Enforcement Division (“SED”) is to 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 MHPs from unreasonable rent increase or eviction, based on program participation, and determine whether the development of an electrification ready service standard for participating MHPs was appropriate or feasible. On August 20, 2021, the Commission issued D.21-08-025, which adopted consumer protection requirements to keep residents of MHPs that participate in the Commission’s MHP Program from experiencing unreasonable rent increases or evictions based on infrastructure improvements funded through the Program. Pursuant to D.21-08-025, SDG&E submitted Advice Letter (AL) 3859-E/3020-G on October 4, 2021, to: 1) update each utility’s Sample Forms - Contracts, Mobilehome Park Utility Conversion Program (Program) Agreement (Form 189-1000) to include consumer protection measures for residents of mobilehome parks participating in the Program; and 2) include a description of the specific information that participating MHP owners are to provide to residents, as well as a discussion of methods the mobilehome park owners may use to communicate these protections to their residents. AL 3859-E/3020-G was approved by the Commission as of October 25, 2021.

This report is submitted in the format requested by the Commission’s SED.⁴ Previous reports were submitted in accordance with D.14-03-021 OP 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 status reports on February 1 of 2016, 2017, 2018, 2019, 2020, 2021, 2022, and 2023. 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.

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.

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, February 1, 2020, February 1, 2021, February 1, 2022, and February 1, 2023 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, 2023 for which final costs have been recorded.⁵ Classification of costs within each category are defined within the table, 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. Please refer back to prior reports for 2015 through 2017 data.

⁵ Per SED’s instructions, 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.

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.

Annual Report Template		Per-Year Costs (Not Cumulative)					
	Descriptor	2018	2019	2020	2021	2022	2023
Program Participation		Per Space Results (Not Cumulative)					
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	1,374	689	455	544	75	588
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	129	116	64	43	1	7
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	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within rural community	-	-	-	-	-	-
Urban Community	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within urban community	2,725	-	1,010	1,181	211	1,155
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)		-	2,845	750	2,345	883	70
Number of TTM MH and Covered Common Area Locations Converted (Electric)		-	2,893	986	2,176	1,371	128
Number of BTM MH Converted Register Spaces (Gas)		-	2605	734	2,225	857	567
Number of BTM MH Converted Register Spaces (Electric)		-	2801	946	2,100	1,313	628
Cost Information		Costs Results (Not Cumulative)					
To The Meter - Capital Costs							
Construction Direct Costs							
Civil/Trenching	To the Meter Construction costs for civil related activities (e.g., trench/cut excavation & backfill [joint trench], paving [temp & final], and distribution system installation - including contractor labor and materials)						
Electric		-	14,642,366	5,121,116	12,037,530	9,696,174	6,962,497
Gas		-	21,900,476	4,705,579	16,492,894	8,807,434	8,408,234
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)	-	-	-	-	-	-
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	-	1,135,215	240,445	755,357	395,397	391,767
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)	-	-	-	-	-	-
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	-	1,461,073	360,166	956,425	458,286	457,889
Design/Construction Management	Cost for engineering, design and construction inspection cost	-	11,625,390	1,924,400	5,192,392	2,149,756	825,751
Other							
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations, including legacy system decommissioning internal labor	-	80,465	14,281	129,073	170,363	153,236
Other Labor (Internal)		-	-	-	-	-	-

Non-Labor	Permits, vehicle utilization, consultant support (e.g., environmental monitoring)	-	1,329,527	162,525	451,797	540,649	105,275
Materials	meters, modules and regulators	-	1,173,032	280,828	995,211	320,128	798,233
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)	-	4,589,495	1,283,625	2,890,891	1,253,863	412,573
Outreach		-	-	-	-	-	-
Other							
Property Tax	Property tax on capital spending not yet put into service	-	382,687	105,314	347,335	67,071	104,315
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	-	1,133,801	224,869	1,414,037	338,118	519,895
Labor (Internal)		-	-	-	-	-	-
Non-Labor	Utility specific overhead driven by corporate cost model	-	7,814,664	3,197,872	5,639,848	1,582,509	913,382
Sub-Total Capital Cost		-	67,268,192	17,621,020	47,302,790	25,779,746	20,053,047

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	-	413,146	126,878	295,495	109,062	50,378
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	-	73,649	5,403	52,424	28,752	16,609
Other							
Labor (Internal)	Program startup cost for supporting organizations, meter removal	-	53,763	3,205	13,832	2,591	3,565
Other Labor (Internal)	Construction management expenses costs (e.g., training, supplies)	-	924,186	197,372	515,573	188,779	103,354
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	-	365,432	45,164	79,171	59,493	67,187
Sub-Total To The Meter		-	1,830,176	378,022	956,494	388,677	241,094
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)	-	1,095,036	35,996	50,985	51,715	44,907
Electric System							

Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	-	5,478,878	2,034,688	4,922,629	2,470,569	1,290,407
Material / Structures		-	4,621,470	1,555,754	3,573,923	2,405,234	1,345,420
Gas System							
Labor	Labor and material for installing BTM Gas infrastructure (e.g. houselines, meter protection, foundation)	-	5,026,798	1,334,510	4,043,342	1,451,711	878,045
Material / Structures		-	1,715,195	498,120	1,821,200	588,606	500,254
Other							
Other Labor (Internal)	NA						
Other Non Labor	BTM Permits, including HCD fees	-	3,984,427	272,896	813,819	375,966	236,676
Sub-Total Beyond The Meter		-	21,921,804	5,731,964	15,225,898	7,343,801	4,295,708
Total TTM & BTM		-	91,020,173	23,731,006	63,485,182	33,512,224	24,589,849

TABLE 2: RATE IMPACT AND REVENUE REQUIREMENT

- Rate impact and revenue requirements are reported based on actual revenue requirement filings for 2015-2023 (i.e., not based on year of financial closure); 2024-2029 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 2015-2023 and 2) the Present Value of revenue requirements for 2024-2029 discounted to 2023 nominal dollars using SDG&E's rate of return (7.67%). 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 millions of dollars.

- Gas rate impact dollar amounts are rounded to the nearest hundred thousandths of a dollar to illustrate a visible rate change.

Rate Impact and Revenue Requirement	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	Present Value Revenue Requirement
Gas																
Average Rate w/o MMBA recovery - Core	N/A	\$0.75407	\$0.77261	\$0.65949	\$0.66627	\$1.04484	\$1.08594	\$1.08664	\$1.21280	\$1.20316	\$1.20316	\$1.20316	\$1.20316	\$1.20316	\$1.20316	
Average Rate w/ MMBA recovery - Core	N/A	\$0.75490	\$0.72707	\$0.66139	\$0.67733	\$1.05978	\$1.09673	\$1.10564	\$1.23474	\$1.23243	\$1.24057	\$1.26052	\$1.26685	\$1.27209	\$1.27754	
Rate Change - Core	N/A	\$0.00083	\$0.00093	\$0.00190	\$0.01106	\$0.01494	\$0.01079	\$0.01900	\$0.02194	\$0.02927	\$0.03741	\$0.05736	\$0.06369	\$0.06893	\$0.07438	
% Rate Change - Core	N/A	0.11%	0.13%	0.29%	1.66%	1.43%	1.00%	1.75%	1.81%	2.43%	3.11%	4.77%	5.29%	5.73%	6.18%	
Average Rate w/o MMBA recovery - Non-Core	N/A	\$0.02262	\$0.02427	\$0.02992	\$0.03122	\$0.05073	\$0.05263	\$0.05409	\$0.07909	\$0.12141	\$0.12141	\$0.12141	\$0.12141	\$0.12141	\$0.12141	
Average Rate w/ MMBA recovery - Non-Core	N/A	\$0.02263	\$0.02429	\$0.02998	\$0.03144	\$0.05096	\$0.05290	\$0.05442	\$0.07957	\$0.12199	\$0.12433	\$0.12451	\$0.12461	\$0.12466	\$0.12471	
Rate Change - Non-Core	N/A	\$0.00001	\$0.00001	\$0.00006	\$0.00021	\$0.00023	\$0.00027	\$0.00033	\$0.00049	\$0.00058	\$0.00292	\$0.00311	\$0.00320	\$0.00325	\$0.00330	
% Rate Change - Non-Core	N/A	0.06%	0.05%	0.19%	0.69%	0.45%	0.50%	0.60%	0.61%	0.48%	2.41%	2.56%	2.64%	2.68%	2.72%	
Electric																
Average Rate w/o MMBA recovery - Total System	N/A	\$20.364	\$21.781	\$23.991	\$23.735	\$24.596	\$23.993	\$31.059	38.471	31.526	31.526	31.526	31.526	31.526	31.526	
Average Rate w/ MMBA recovery - Total System	N/A	\$20.366	\$21.783	\$23.997	\$23.761	\$24.614	\$24.031	\$31.132	\$38.578	\$31.624	\$31.610	\$31.608	\$31.612	\$31.614	\$31.616	
Rate Change - Total System	N/A	\$0.002	\$0.002	\$0.006	\$0.026	\$0.018	\$0.038	\$0.073	\$0.107	\$0.098	\$0.084	\$0.082	\$0.086	\$0.088	\$0.090	
% Rate Change - Total System	N/A	0.01%	0.01%	0.03%	0.11%	0.07%	0.16%	0.24%	0.28%	0.31%	0.27%	0.26%	0.27%	0.28%	0.28%	
Revenue Requirement (In Millions)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	
Gas Revenue Requirement-TTM	\$0.000	\$0.424	\$0.192	\$0.124	\$3.952	\$5.593	\$3.900	\$6.160	\$8.397	\$11.652	\$15.365	\$24.273	\$27.278	\$29.988	\$32.635	\$134.229
Electric Revenue Requirement-TTM	\$0.000	\$0.243	\$0.185	\$0.170	\$2.924	\$4.979	\$4.120	\$6.496	\$10.703	\$11.174	\$8.584	\$8.242	\$8.916	\$9.638	\$10.363	\$74.149
Gas Revenue Requirement-BTM	\$0.000	\$0.000	\$0.299	\$0.863	\$1.827	\$2.207	\$1.781	\$3.921	\$3.244	\$3.922	\$3.376	\$5.198	\$5.573	\$5.683	\$5.966	\$36.761
Electric Revenue Requirement-BTM	\$0.000	\$0.000	\$0.231	\$0.925	\$2.076	\$2.921	\$2.771	\$5.995	\$6.838	\$6.128	\$6.257	\$6.229	\$6.195	\$5.853	\$5.468	\$49.997

4. Program Timeline

As of December 31, 2023, SDG&E has converted 79MHPs (8,514 permitted spaces), which is nearly 34% of the eligible mobilehome spaces within SDG&E's service territory.⁷

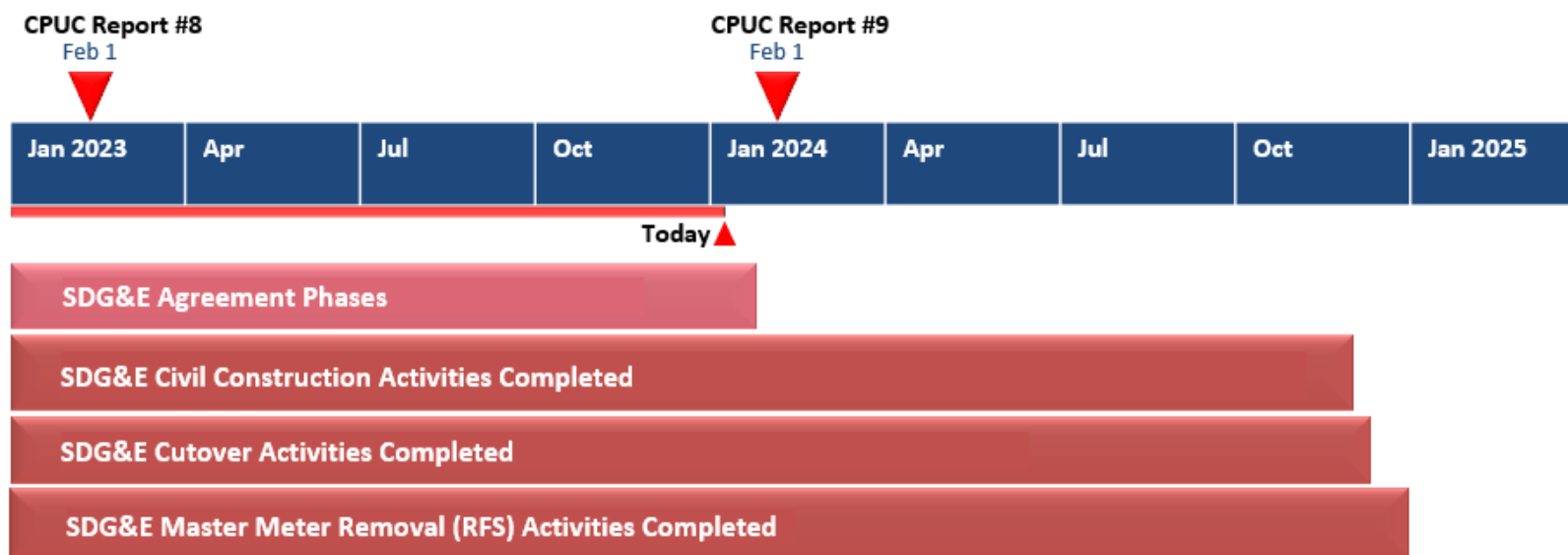
SDG&E has measured its progress against the timeline shown in Figure 1 ("SDG&E's Tentative Timeline for Implementation of the Extended Pilot and Current Status") below. In developing the timeline, SDG&E has assumed certain conditions, including, but not limited to, the following: 1) there are no constraints 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 2021. 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 was required from SED within the second quarter of 2021.

On August 20, 2021, SED provided a new priority list of eligible parks. The list included Category 1 projects, comprised of parks estimated to be contacted by the utilities before the application period in 2025, and Category 2 projects that may be contacted before the new period but may be re-prioritized for the 2025 list. SDG&E continues to develop a comprehensive schedule for the outlined Category 1 projects to support the overall objective of converting 50 percent of master meters by 2030. Currently, it has secured Applications for projects through 2024, and it will continue to develop its schedule through 2025 to incorporate all Category 1 MHPs moving forward, reprioritizations requested by SED, and request replacements for MHP's declining to move forward.

⁷ 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 and Enforcement Division.

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



5. Program Assessment and Challenges

Per the CPUC Decision D.20-04-004, SDG&E continues to execute the program in accordance with the Commission’s annual 3.33% conversion target. This would result in meeting the goal of converting 50% of the master metered mobilehome parks by the end of the 10-year program. During 2022, however, the program faced a notable obstacle that resulted in annual conversions below the 3.33% target. Due to the unavailability of electric materials--notably transformers--multiple projects were required to be paused until required materials were secured. As a result, final completion for these projects did not take place until 2023. Based on current material forecasts and resource availability, SDG&E anticipates achieving the cumulative 3.33% conversion target in 2024.

Additionally, COVID-19 had continued to impact the conversion program. In March of 2020, the World Health Organization (WHO) declared COVID-19 a pandemic and, in response, SDG&E instituted various hygiene measures, social distancing protocols, and alternate outreach and education methods in support of safety and Program goals and objectives. With the COVID-19 restrictions and regulations, the Program 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 these issues, the SDG&E Mobilehome Park Utility Conversion Program continues to be successful, as demonstrated by the following performance indicators:

Program Penetration

SDG&E has successfully partnered with MHP Owners/Operators and, as of December 31, 2023, completed nearly 34% 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 89,000 hours. SDG&E was incident free in 2021 over approximately 70,000 hours of labor for contractors and MHP program employees combined. Over the course of 2022, there were no incidents over approximately 99,000 hours. In 2023, there were three reportable contractor first-aid incidents over approximately 169,000 hours of combined contractors' and MHP program employees' labor. Additionally, 86 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

The MHP Team continues to solicit feedback from residents upon completion of park conversions. For 2023, nearly half say that their perception of SDG&E has improved as a result of the conversion.

6. Conclusion

This concludes the ninth 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>.⁸

⁸ D.20-04-004, OP 10 requires the utilities to post copies of their Annual Report on their respective websites.

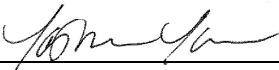


**Mobilehome Park Utility Upgrade Program
Management Certification**

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: 01/01/2023 to 12/31/2023
Start Date End Date

 Executed on: February 1, 2024
Signature of Officer Month, Day, Year

Tashonda Taylor Vice President of Gas Operations
Print Name Title

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

**DECLARATION OF ROBERT PISANESCHI REGARDING CONFIDENTIALITY OF
CERTAIN DOCUMENTS PURSUANT TO D.17-09-023**

I, Robert Pisaneschi, do declare as follows:

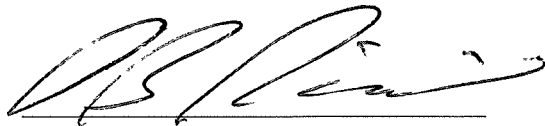
1. I am the Mobilehome Park and Capital Gas Construction Manager for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Tashonda Taylor, Vice President of Gas Operations for SDG&E. I have reviewed the confidential information included within SDG&E’s Mobilehome Park Utility Conversion Program Annual Report (“Annual Report”). 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 belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 17-09-023 and its subsequent decisions and General Order (“GO”) 66-D to demonstrate that the confidential information (“Protected Information”) provided in the Annual Report is within the scope of data protected as confidential under applicable law.

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 2024 at San Diego, California.



Robert Pisaneschi
MHP & Capital Gas Construction Manager

ATTACHMENT A

**SDG&E Request for Confidentiality on the following Protected Information in its
Mobilehome Park Utility Conversion Program Annual Report**

Description and Location of Data	Legal Citations	Narrative Justification
<p>Information highlighted in yellow in the accompanying List of Active Parks to SDG&E’s Mobilehome Park (MHP) Utility Conversion Program Annual Report contains customer information (i.e., California Department of Housing and Community Identification (HCD ID), MHP names, city, and Permit to Operate (PTO) count).</p>	<p>California Public Records Act (CPRA) Exemption, Gov’t Code § 7927.705 (“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 § 7927.700 (“disclosure of which would constitute an unwarranted invasion of personal privacy”).</p>	<p>The yellow-highlighted cells contain customer information that is market-sensitive and, if revealed, could put the MHP at an unfair business disadvantage because it provides nonpublic information regarding MHP program participation. Unfair business disadvantages include but are not limited to: (1) a competitive disadvantage in which other MHP owners who have not participated in a similar program may use this information to their advantage, potentially attracting residents away from the disclosed park. (2) Difficulty in attracting investors. Prospective investors or partners may be hesitant to get involved with a MHP park whose owner has participated in a program, fearing potential financial risks or challenges tied to easements and their ability to develop the property. (3) Impact on property values. Knowledge of the owner’s participation in a program could raise concerns among current and potential residents about the financial health of the MHP park. This, in turn, could impact property values within the MHP park.</p> <p>Further, such personal information, if disclosed, could pose a risk of fraud, identity theft, or other personal, commercial, or financial damage to the customers.</p> <p>Disclosure may also constitute an “unwarranted invasion of personal privacy.”</p>

