

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.

Rulemaking 18-04-018
(Filed April 26, 2018)

**SOUTHWEST GAS CORPORATION'S (U 905 G)
MOBILEHOME PARK CONVERSION PROGRAM
ANNUAL STATUS REPORT**

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February 3, 2025

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7 **ANNUAL STATUS REPORT**

8 In accordance with Ordering Paragraph (OP) 10 in California Public Utilities
9 Commission Decision 20-04-004 (Decision), Southwest Gas Corporation (Southwest Gas)
10 herewith submits its Mobilehome Park Utility Conversion Program Annual Status Report
11 (Report) utilizing the revised annual report template contained in the updated Safety and
12 Enforcement Division/Energy Division Staff Proposal (January 2020 Revision) and included
13 as Appendix B to the Decision. Per OP 10, Southwest Gas will make the Report available
14 on its website located at <https://www.swgas.com/en/california-rates-and-regulation>.

15 Dated this 3rd day of February 2025 at Las Vegas, Nevada.

16 Respectfully submitted,
17 SOUTHWEST GAS CORPORATION



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Southwest Gas Corporation

(U 905 G)

Mobilehome Park Utility Conversion Program Tenth Annual Status Report

In compliance with:
Decisions 14-03-021 and 20-04-004

Reporting Period:
January 1, 2024 through December 31, 2024

February 1, 2025



SOUTHWEST GAS CORPORATION

I. EXECUTIVE SUMMARY

In accordance with Decision (D.) 14-03-021 and D.20-04-004 of the California Public Utilities Commission (Commission) and under the direction of the Commission's Safety and Enforcement Division (SED) and Energy Division Staff¹, Southwest Gas Corporation (Southwest Gas or Company) submits its tenth Annual Status Report (Annual Report) on the Mobilehome Park Utility Conversion Program² (MHP Program).

Company Overview

Southwest Gas has two separate and distinct service territories within northern and southern California. Areas served in northern California include North Lake Tahoe, South Lake Tahoe, and Truckee. In southern California, Southwest Gas serves Big Bear, Needles, Barstow, Victorville, and other surrounding cities in the high desert area. Southwest Gas serves 38 master-metered submetered mobilehome parks (MHP) in its southern California service territory and 11 MHPs in its northern California service territory totaling approximately 3,200 MHP spaces.

II. MHP PROGRAM BACKGROUND AND OVERVIEW

On March 14, 2014, the Commission issued D.14-03-021, which established the MHP Pilot Program, a statewide, voluntary three-year (2015 through 2017) "living pilot" program with the goal of converting approximately 10 percent of the total MHP spaces within each of the Commission-regulated gas and electric utilities' service territories. Upon conversion, MHP residents receive natural gas and/or electric service directly from their respective utility service providers. On September 28, 2017, the Commission approved Resolution E-4878, authorizing, among others, Southwest Gas' Advice Letter No. 1035, which requested continuation of the MHP Pilot Program beyond the initial three-year pilot period.

In April 2018, the Commission opened Rulemaking (R.) 18-04-018 to evaluate the MHP Pilot Program and adopt programmatic modifications. Utilities were directed to submit supplemental MHP Pilot Program data.³ Commission Staff provided guidance to the utilities for the submission of the supplemental program data utilizing the annual report template, which included:

1. The total costs for MHP Pilot Program conversions were to be reported in the year that final costs were recorded.
2. MHP Pilot Program conversions were to be included in the reporting year, if, as of September 30 the estimated trailing costs did not exceed 5% of total conversion costs for that MHP.
3. The number of MHP spaces converted were to be reported in the same year that MHP Pilot Program conversion costs are entered, so that the aggregate costs and aggregate spaces correspond.

Additionally, Commission Staff directed utilities to provide an updated list of all conversions completed or that are in progress, including MHP location (city/county), MHP space count, and the overlapping utility.

¹ Per electronic mail from SED Staff dated December 21, 2018, respondent utilities were directed to submit a 2018 Annual Status Report on their Mobilehome Park Utility Upgrade Programs by February 1, 2019. In this same email, SED Staff provided the annual report template to be used.

² The program was formerly referred to as the Mobilehome Park Utility Upgrade Pilot Program (MHP Pilot Program) during the three-year pilot program adopted in D.14-03.021.

³ Assigned Commissioner's Scoping Memo and Ruling issued in R.18-04-018 on August 31, 2018.

On April 16, 2020, the Commission approved D.20-04-004, establishing a permanent 10-year MHP Program beginning in 2021, primarily relying on the MHP Pilot Program requirements adopted in D.14-03-021, as well as imposing additional requirements and adjustments, including:

- The MHP Program is now open to MHPs with and without submeters.⁴
- MHP common use buildings are eligible for conversion under the MHP Program, at SED’s discretion, which will be served under the utility’s commercial rate schedules.⁵ MHP Owner/Operators are still responsible for “Beyond the Meter” expenses for common use buildings.⁶
- Prioritization will continue to be based on gas safety first, then reliability, dual conversions and capacity improvements consistent with D.14-03-021. The following additional prioritization criteria are to be included in the ongoing MHP Program:
 - Whether the MHP has reported any gas incidents;
 - Whether the MHP has experienced damage of its gas/electric infrastructure due to wildfire, especially if the MHP is already scheduled to be converted; and,
 - A Disadvantaged Community criterion will be included that will serve as a tiebreaker if two MHPs have the same safety score.⁷
- Each gas and electric utility shall continue annual reporting on the MHP Program, beginning on February 1, 2021, and continuing thereafter until the end of the program using the Revised Annual Report Template included as Appendix B to D.20-02-004.⁸

D.20-04-004 authorized Southwest Gas to convert 450 eligible MHP spaces a year, at an annual “soft target” cost of \$5.2 million.

III. REPORT

Southwest Gas has prepared and submits its tenth Annual Report using the Annual Report Template adopted in D.20-02-004 and guidance criteria for the period from January 1, 2024 through December 31, 2024 (Reporting Period).

MHP Program Conversion Rate and Status

Table 1 below depicts the MHP conversions completed within the Reporting Period under the MHP Program.

MHP	City	County	Overlapping Electric Utility	# of Spaces	# Spaces Converted
1	Kings Beach	Placer	Liberty	43	31
2	South Lake Tahoe	El Dorado		24	21
3	South Lake Tahoe			8	8

⁴ *Id.*, at pg. 40.

⁵ *Id.*, at pg. 41.

⁶ *Id.*, at pgs.40-41.

⁷ *Id.*, at pgs. 49-50.

⁸ *Id.*, OP 10, at pg. 174.

MHP	City	County	Overlapping Electric Utility	# of Spaces	# Spaces Converted	
4	South Lake Tahoe			61	61	
5	South Lake Tahoe	El Dorado	Liberty	265	265	
6	Big Bear Lake	San Bernardino	BVES	250	250	
7	Victorville		SCE	48	31	
8	Victorville			50	50	
9	Victorville			136	69	
10	Hesperia			31	31	
11	Apple Valley			98	95	
12	Victorville			68	67	
13	Apple Valley			40	40	
14	Barstow			61	39	
15	Barstow			92	72	
16	Barstow			38	61	
17	Barstow			25	25	
18	Victorville			104	104	
19	Apple Valley			72	72	
20	Adelanto			41	41	
21	Adelanto			30	30	
22	Adelanto			15	15	
23	Needles			City of Needles	65	63
24	Barstow			SCE	32	32
25	Daggett				24	24
26	Victorville				366	366
27	Hesperia		99		99	
28	Barstow		264		254	
29	South Lake Tahoe		El Dorado		Liberty	18
30	South Lake Tahoe		El Dorado	Liberty	9	9
31	South Lake Tahoe		El Dorado	Liberty	30	30
32	Victorville		San Bernardino	SCE	257	254
33	Apple Valley				38	35
34	Hinkley	8			5	
35	Barstow	31			30	
36	Barstow	94			92	

Total Spaces 2,935 2,789

Table 2 below depicts the remaining MHPs⁹ that were prioritized for 2024 and are currently in progress and expected to be converted in 2025.

MHP	City	County	Overlapping Electric Utility	# of Spaces
1	South Lake Tahoe	El Dorado	Liberty	17
2	Yermo	San Bernardino	SCE	84
3	Victorville			35
Total Spaces				136

Southwest Gas, in consultation with and approved by SED, prioritized 2 MHPs for conversion in calendar year 2025. These MHPs are listed in Table 3 below.

MHP	City	County	Overlapping Electric Utility	# of Spaces
1	South Lake Tahoe	El Dorado	Liberty	78
2	Daggett	San Bernardino	SCE	286
Total Spaces				364

MHP Program Cost Accounting

Southwest Gas completed 6 additional MHP conversions through 2024, MHPs 31 through 36 in Table 1 above. The supplemental program and cost data is provided as Attachment A to this Annual Report.

Conclusion

Southwest Gas appreciates the opportunity to provide its tenth Annual Report and looks forward to the continuation of the MHP Program.

⁹ Conversion of these MHPs, which were prioritized in 2024, have been rescheduled to 2025 due to the unavailability of qualified contractors that meet Southwest Gas and SCE's requirements. The conversions are expected to be fully completed by November 2025, and their completion status will be included in Southwest Gas' 2025 Annual Report.

VERIFICATION

Amy L. Timperley, being first duly sworn, deposes and says: I am the Senior Vice President/Chief Regulatory, Public Affairs & Gas Resources Officer of Southwest Gas Corporation, and I am authorized to make this verification on its behalf. I have read the foregoing Mobilehome Park Utility Conversion Program Tenth Annual Report and I believe the statements contained herein to be true, based upon either my own personal knowledge or upon information and belief. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 3rd day of February 2025.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

Amy L. Timperley
Senior Vice President/Chief Regulatory, Public
Affairs & Gas Resources Officer

ATTACHMENT A
SOUTHWEST GAS CORPORATION (U 905 G)
MHP PROGRAM ANNUAL STATUS REPORT 10

Annual Status Report 10		Per-year costs; not cumulative									
		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
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)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 19,886	\$ -	\$ -	\$ -	-
Outreach											
Property Tax	Property tax on capital spending not yet put into service	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,232	-
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.	\$ -	\$ -	\$ 103	\$ 90	\$ 1,113	\$ 7,591	\$ 826	\$ 205	\$ 1,595	10,141
Other											
Labor (Internal)***	Labor (Internal)***	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 57,926	-
Non-Labor	Utility specific overhead driven by corporate cost model	\$ -	\$ -	\$ 5,926	\$ 5,262	\$ 111,641	\$ 125,433	\$ 8,119	\$ 115,666	\$ 2,113,795	185,414
Sub-Total Capital Cost To The Meter - Expense Costs		\$ -	\$ -	\$ 1,186,020	\$ 2,966,820	\$ 1,185,183	\$ 3,109,807	\$ 375,099	\$ 2,925,606	\$ 4,658,382	\$ 3,042,853
Project Management Costs											
Project Management Office (PMO)	Program startup cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	\$ -	\$ -	\$ 500	\$ 2,915	\$ -	\$ 34,377	\$ -	\$ -	\$ -	-
Other											
Labor (Internal)	Program startup cost for supporting organizations	\$ -	\$ -	\$ -	\$ -	\$ 435	\$ 2,505	\$ -	\$ -	\$ -	-
Other Labor (Internal)***		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,689	\$ -	\$ -	\$ -	-
Sub-Total To The Meter		\$ -	\$ -	\$ 500	\$ 2,915	\$ 435	\$ 38,571	\$ -	\$ -	\$ -	\$ -

ATTACHMENT A
SOUTHWEST GAS CORPORATION (U 905 G)
MHP PROGRAM ANNUAL STATUS REPORT 10

Annual Status Report 10		Per-year costs, not cumulative										
		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	
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	N/A											
Electric System	Labor and material for installing BTM Electric infrastructure (e.g. Labor / Structures											
Gas System	Labor and material for installing BTM Gas infrastructure (e.g. Labor / Structures											
Other	BTM Permits, including HCD fees											
Sub-Total Beyond The Meter												
Total TTM & BTM												

Rate Impact and Revenue Requirement		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 [k]
Gas	Average Rate w/o MMBA recovery - Core [b]											
	Average Rate w/ MMBA recovery - Core [c]											
	Rate Change - Core [d]											
	% Rate Change - Core [e]											
	Average Rate w/o MMBA recovery - Non-Core [f]											
	Average Rate w/ MMBA recovery - Non-Core [g]											
	Rate Change - Non-Core [h]											
	% Rate Change - Non-Core [i]											
Electric	Average Rate w/o MMBA recovery - Total System											
	Average Rate w/ MMBA recovery - Total System											
	Rate Change - Total System											
	% Rate Change - Total System											
Revenue Requirement												
	Gas Revenue Requirement-TTM [j]											
	Electric Revenue Requirement-TTM [k]											
	Gas Revenue Requirement-BTM [l]											
	Electric Revenue Requirement-BTM [m]											

Present Value Revenue Requirement		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 [k]
	Gas Revenue Requirement-TTM [j]											
	Electric Revenue Requirement-TTM [k]											
	Gas Revenue Requirement-BTM [l]											
	Electric Revenue Requirement-BTM [m]											

Notes:

(a) Estimated on pre-conversion and post-conversion records.

(b) Average Rate w/o MMBA recovery - Core represents the simple average of Southwest Gas' GS-40/GN-40 and SLT-40 First 100 term rates effective November 1, 2018, January 1, 2021, January 1, 2022, January 1, 2023, January 1, 2024, and January 1, 2025. Southwest Gas does not forecast its rates for future periods, therefore the January 1, 2025 effective rate is held constant through the end of the projection period.

(c) Southwest Gas initial recovery rate for MMHP replacement activity was effective in September 2019.

(d) Rate Change - Core represents the calculated rate to recover the calculated revenue requirement beginning for 2021. The 2020 revenue requirement is included in the Company's 2021 Test Year rate case base revenues.

(e) % Rate Change - Core = Rate Change - Core / Average Rate w/ MMBA recovery - Core

(f) Average Rate w/o MMBA recovery - Non-Core represents the simple average of Southwest Gas' GS-70/GN-70 and SLT-70 rates effective November 1, 2018, January 1, 2021, January 2022, January 1, 2023, January 1, 2024, and January 1, 2025. Southwest Gas does not forecast its rates for future periods, therefore the January 1, 2025 effective rate is held constant through the end of the projection period.

(g) Southwest Gas initial recovery rate for MMHP replacement activity was effective in September 2019.

(h) Rate Change - Non-Core represents the calculated rate to recover the calculated revenue requirement beginning in 2021. The 2020 revenue requirement is included in the Company's 2021 Test Year rate case base revenues.

(i) % Rate Change - Non-Core = Rate Change - Non-Core / Average Rate w/ MMBA recovery - Non-Core

(j) Present Value calculation assumes 10% discount rate for the stream of revenue requirement amounts indicated.

(k) Replacement activity through September 30, 2018, is included for recovery in the Company's 2021 Test Year rate case.