



**Mobilehome Park Utility Conversion Program  
Annual Report**

**PUBLIC VERSION**

**February 1, 2022**

# SDG&E MOBILEHOME PARK UTILITY CONVERSION PROGRAM

## FEBRUARY 1, 2022 ANNUAL REPORT

### TABLE OF CONTENTS

**Page**

<b>1. Executive Summary .....</b>	<b>2</b>
<b>2. Procedural History .....</b>	<b>2</b>
<b>3. Cost Accounting .....</b>	<b>4</b>
<b>4. Program Timeline .....</b>	<b>9</b>
<b>5. Program Assessment .....</b>	<b>11</b>
<b>6. Conclusion .....</b>	<b>12</b>

# SDG&E MOBILEHOME PARK UTILITY CONVERSION PROGRAM

## FEBRUARY 1, 2022 ANNUAL REPORT

### 1. Executive Summary

As detailed in this Report, San Diego Gas and Electric (“SDG&E”) continues to successfully implement the extended Mobilehome Park (“MHP”) Pilot Program. As of December 31, 2021, SDG&E has converted<sup>1</sup> 54 mobilehome parks (6,578 permitted spaces), which is 19% of the eligible mobilehome spaces within SDG&E’s service territory.

### 2. Procedural History

On March 13, 2014, the California Public Utilities Commission (“Commission”) approved and authorized San Diego Gas and Electric Company (“SDG&E”) to execute the MHP Utility Conversion Program (“Program”) through Decision (D.) 14-03-021 (“Decision”). The Program was initiated as a three-year pilot (2015-2017) (“Pilot Program”) to convert master-metered/sub-metered natural gas and/or electric services to direct utility services for qualified mobilehome parks and manufactured housing communities (collectively “MHPs”). On September 28, 2017, Resolution E-4878 authorized the investor-owned utilities (“IOUs”) to continue their MHP Pilot Programs through December 31, 2019 (“Pilot Program Extension”).<sup>2</sup> 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.<sup>3</sup> Eligible MHPs were defined as those where SDG&E and/or MHP owners had incurred “financial obligations” on or before November 1, 2018. Resolution E-4958 further determined the number of spaces converted in each of years 2020 and 2021 may not exceed 3.33% of the total master-metered spaces in a utility’s service territory, excluding MHPs that are already under conversion or scheduled for conversion. It further clarified that if a single MHP upgrade would result in the utility exceeding the 3.33% maximum requirement, the utility is authorized to proceed with that upgrade.

---

<sup>1</sup> “Converted” MHPs are those where System Cutover has occurred and the Master Meter has been removed.

<sup>2</sup> Resolution E-4878, ordering paragraph (OP) 7.

<sup>3</sup> Resolution E-4958, OP 1.

On April 16, 2020, the Commission issued Decision 20-04-004, approving a ten-year Mobilehome Park Utility Conversion Program from 2021 through 2030. Following a new application period established by the Commission during the 1<sup>st</sup> quarter of 2020, 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 Safety and Enforcement Division ("SED").<sup>4</sup> Previous reports were submitted in accordance with D.14-03-021OP 10, which directs each electric and/or gas utility to prepare a status report for the Program on February 1 of each year. SDG&E filed status reports on February 1 of 2016, 2017, 2018, 2019, 2020, and 2021. In SDG&E's February 1, 2016 report, SDG&E provided a timeline for implementation of the three-year Pilot Program, its status on the timeline, the number of initial applications received, information on the MHPs that would be converted, and the number of spaces to be converted. SDG&E also provided an update on progress made against the timeline for implementation, as well as a preliminary cost assessment and/or cost accounting of to-the-meter ("TTM") and beyond-the-meter ("BTM") construction costs in its February 1, 2017, February 1, 2018, February 1, 2019, February 1, 2020, and February 1, 2021 reports. This report

---

<sup>4</sup> 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.

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, 2021 for which final costs have been recorded.<sup>5</sup> 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.<sup>6</sup> Table 2 below shows the associated revenue requirements and rate impacts.

**TABLE 1: ANNUAL REPORT TEMPLATE**

- Bolded words in "Descriptor" column were added by SDG&E to clarify the reported data.
- All dollar amounts in Table 1 are rounded to the nearest dollar.
- Per the SED instructions accompanying the template, Table 1 costs have been grouped by project and included in the year in which financial closure for each project was completed, with financial closure defined as when all costs have been recorded for a project. Using this methodology has resulted in a shift in reporting year for certain projects where there have been unforeseen issues requiring remediation or trailing costs within the allowable threshold in a year different than previously reported as the year of financial closure.

Annual Report Template		Per-year costs; (not cumulative)						
	Descriptor	2015	2016	2017	2018	2019	2020	2021
<b>Program Participation</b>								
CARE/FERA enrollment	Number of individuals enrolled in CARE/FERA after the conversion; <b>the data provided is not final as a process for capturing all CARE enrollments is still in development</b>	-	-	255	1,374	689	455	544
Medical Baseline	Number of individuals enrolled in Medical Baseline after the conversion; <b>the data provided is not final as a process for capturing all MB enrollments is still in development</b>	-	-	20	129	116	64	43

<sup>5</sup> Per SED’s email, as well as the instructions applicable to the Supplemental Cost Data template sent on November 13, 2018, the template captures projects for which final costs have been recorded. Trailing costs may follow, but they are not expected to exceed approximately 5% of a project’s total cost.

<sup>6</sup> “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.

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	-	-	397	2,725	0	1,010	1,181
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
<b>Completed Spaces</b>	Spaces converted that correspond to the project costs reported below (TTM includes common areas). If a project incurs costs over multiple years, report all project costs and spaces converted in the year the project closes.							
Number of TTM MH and Covered Common Area Locations Converted (Gas)		-	-	183	-	2,845	750	3,010
Number of TTM MH and Covered Common Area Locations Converted (Electric)		-	-	187	-	2,893	986	2,848
Number of BTM MH Converted Register Spaces (Gas)		-	-	180	-	2605	734	2,874
Number of BTM MH Converted Register Spaces (Electric)		-	-	180	-	2801	946	2,750
<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 (e.g., trench/cut excavation & backfill [joint trench], paving [temp & final], and distribution system installation - including contractor labor and materials)							
Electric		-	-	787,030	0	13,699,385	5,531,451	16,122,318
Gas		-	-	1,153,053	0	20,543,778	5,581,843	23,031,284
<b>Gas System</b>								

Labor	Cost for installation of distribution Gas assets, pre-inspection testing, decommissioning of legacy system (Gas Design cost was previously incorporated here) <b>(Specific to SDG&amp;E, no gas design costs were previously incorporated in this line item)</b>	-	-	-	0	-	-	-
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	-	-	56,502	0	1,087,792	289,745	970,092
<b>Electric System</b>								
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here) <b>(Specific to SDG&amp;E, no gas design costs were previously incorporated in this line item)</b>	-	-	-	0	-	-	-
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	-	-	120,459	0	1,376,521	424,151	1,153,664
Design/Construction Management	Cost for engineering, design and construction inspection cost	-	-	619,570	0	9,469,196	2,018,263	4,956,764
<b>Other</b>								
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations, <b>including legacy system decommissioning internal labor</b>	-	-	3,883	0	80,226	14,281	221,998
Other Labor (Internal)		-	-	-	0	-	-	-
Non-Labor	Permits, <b>vehicle utilization, consultant support (e.g., environmental monitoring)</b>	-	-	55,909	0	1,298,345	116,627	612,504
Materials	meters, modules and regulators	-	-	63,206	0	1,067,990	254,056	931,798
<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)	-	-	222,033	0	4,012,454	1,318,691	2,813,051
Outreach		-	-	-	0	-	-	-
<b>Other</b>								
Property Tax	Property tax on capital spending not yet put into service	-	-	13,438	0	359,016	110,158	378,467
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.	-	-	32,754	0	1,082,953	243,024	1,566,532
Labor (Internal)		-	-	-	0	-	-	-
Non-Labor	Utility specific overhead driven by corporate cost model	-	-	575,576	0	7,374,105	3,541,361	6,335,422
<b>Sub-Total Capital Cost</b>		-	-	<b>3,703,414</b>	<b>0</b>	<b>61,451,761</b>	<b>19,443,651</b>	<b>59,093,895</b>
<b>To The Meter - Expense Costs</b>								
<b>Project Management Costs</b>								
Project Management Office (PMO)	Program startup cost, <b>program management activities associated with Outreach or other non-capital activities</b>	-	-	19,212	0	300,471	324,565	311,039
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	-	-	61,681	0	958,721	339,256	483,468
<b>Other</b>								
Labor (Internal)	Program startup cost for supporting organizations, <b>meter removal</b>	-	-	-	0	32,438	3,677	34,685
Other Labor (Internal)	<b>Construction management expenses costs (e.g., training, supplies)</b>	-	-	5,077	0	74,457	3,548	5,061
Non-Labor	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project, <b>vehicle utilization, and overheads associated with meter removal</b>	-	-	12,731	0	353,020	65,886	121,334
<b>Sub-Total To The Meter</b>		-	-	<b>98,701</b>	<b>0</b>	<b>1,719,106</b>	<b>736,933</b>	<b>955,586</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>	<b>All civil labor for BTM construction, such as landscaping (does not include trenching work)</b>	-	-	34,810	0	1,081,236	35,996	38,715
<b>Electric System</b>								
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	-	-	463,588	0	5,137,733	2,513,892	2,859,961
Material / Structures		-	-	245,442	0	4,205,085	1,820,104	2,237,651
<b>Gas System</b>								
Labor	Labor and material for installing BTM Gas infrastructure (e.g. houselines, meter protection, foundation)	-	-	324,953	0	4,713,546	1,554,274	2,085,751
Material / Structures		-	-	83,822	0	1,575,335	694,480	900,656
<b>Other</b>								
Other Labor (Internal)		-	-	-	-	-	-	-
<b>Other Non Labor</b>	<b>BTM Permits, including HCD fees</b>	-	-	135,988	0	3,749,990	322,522	11,736,873
<b>Sub-Total Beyond The Meter</b>		-	-	<b>1,288,602</b>	<b>0</b>	<b>20,462,925</b>	<b>6,941,267</b>	<b>19,859,607</b>
<b>Total TTM &amp; BTM</b>		-	-	<b>5,090,717</b>	<b>0</b>	<b>83,633,791</b>	<b>27,121,852</b>	<b>79,909,089</b>

**TABLE 2: RATE IMPACT AND REVENUE REQUIREMENT**

- Rate impact and revenue requirements are reported based on actual revenue requirement filings for 2015-2022 (i.e., not based on year of financial closure); 2023-2027 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 2015-2021 and 2) the Present Value of revenue requirements for 2022-2027 discounted to 2021 nominal dollars using SDG&E's rate of return (7.55%). SDG&E does not typically calculate present value of total revenue requirements for rate-making purposes.

Although amortization amounts will be collected in rates over a 12-month period, this exercise assumed simplified collection at year-end

- Revenue requirements are in 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														
Rate Impact	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
<b>Gas</b>														
Average Rate w/o MMBA recovery - Core	N/A	\$0.75407	\$0.77261	\$0.65949	\$0.66627	\$1.04484	\$1.08594	\$1.08664	\$1.08664	\$1.08664	\$1.08664	\$1.08664	\$1.08664	\$1.08664
Average Rate w/ MMBA recovery - Core	N/A	\$0.75490	\$0.72707	\$0.66139	\$0.67733	\$1.05978	\$1.09673	\$1.10564	\$1.11448	\$1.12115	\$1.12683	\$1.13245	\$1.13731	
Rate Change - Core	N/A	\$0.00083	\$0.00093	\$0.00190	\$0.01106	\$0.01494	\$0.01079	\$0.01900	\$0.02784	\$0.03451	\$0.04019	\$0.04581	\$0.05067	
% Rate Change - Core	N/A	0.11%	0.13%	0.29%	1.66%	1.43%	1.00%	1.75%	2.56%	3.18%	3.70%	4.22%	4.66%	
Average Rate w/o MMBA recovery - Non-Core	N/A	\$0.02262	\$0.02427	\$0.02992	\$0.03122	\$0.05073	\$0.05263	\$0.05409	\$0.05409	\$0.05409	\$0.05409	\$0.05409	\$0.05409	
Average Rate w/ MMBA recovery - Non-Core	N/A	\$0.02263	\$0.02429	\$0.02998	\$0.03144	\$0.05096	\$0.05290	\$0.05442	\$0.05462	\$0.05472	\$0.05481	\$0.05488	\$0.05492	
Rate Change - Non-Core	N/A	\$0.00001	\$0.00001	\$0.00006	\$0.00021	\$0.00023	\$0.00027	\$0.00033	\$0.00053	\$0.00063	\$0.00072	\$0.00079	\$0.00083	
% Rate Change - Non-Core	N/A	0.06%	0.05%	0.19%	0.69%	0.45%	0.50%	0.60%	0.97%	1.16%	1.33%	1.47%	1.54%	
<b>Electric</b>														
Average Rate w/o MMBA recovery - Total System	N/A	\$20.364	\$21.781	\$23.991	\$23.735	\$24.596	\$23.993	\$31.059	\$31.059	\$31.059	\$31.059	\$31.059	\$31.059	
Average Rate w/ MMBA recovery - Total System	N/A	\$20.366	\$21.783	\$23.997	\$23.761	\$24.614	\$24.031	\$31.132	\$31.132	\$31.134	\$31.141	\$31.148	\$31.153	
Rate Change - Total System	N/A	\$0.002	\$0.002	\$0.006	\$0.026	\$0.018	\$0.038	\$0.073	\$0.073	\$0.075	\$0.082	\$0.089	\$0.094	
% Rate Change - Total System	N/A	0.01%	0.01%	0.03%	0.11%	0.07%	0.16%	0.24%	0.23%	0.24%	0.26%	0.29%	0.30%	
<b>Revenue Requirement (In Millions)</b>														
Gas Revenue Requirement-TTM	\$0.000	\$0.424	\$0.192	\$0.124	\$3.952	\$5.593	\$3.900	\$6.160	\$11.217	\$14.158	\$16.630	\$19.035	\$21.540	\$80.564
Electric Revenue Requirement-TTM	\$0.000	\$0.243	\$0.185	\$0.170	\$2.924	\$4.979	\$4.120	\$6.496	\$6.924	\$7.184	\$8.241	\$9.232	\$10.151	\$49.553
Gas Revenue Requirement-BTM	\$0.000	\$0.000	\$0.299	\$0.863	\$1.827	\$2.207	\$1.781	\$3.921	\$3.524	\$4.130	\$4.675	\$5.265	\$5.361	\$27.603
Electric Revenue Requirement-BTM	\$0.000	\$0.000	\$0.231	\$0.925	\$2.076	\$2.921	\$2.771	\$5.995	\$5.414	\$5.504	\$5.731	\$5.912	\$5.902	\$35.806

#### 4. Program Timeline

Pursuant to Resolution E-4878, SDG&E planned to achieve its initial Pilot Program target of 10% in 2018 and continue conversion of up to an additional 5% of MHP spaces by December 31, 2019. As of December 31, 2021, SDG&E has converted 54 MHPs (6,578 permitted spaces), which is nearly 19% of eligible the mobilehome spaces within SDG&E’s service territory.<sup>7</sup>

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

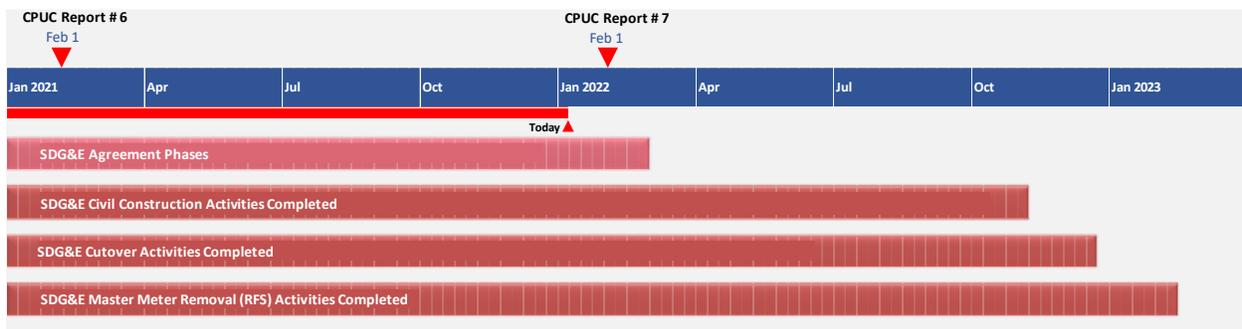
<sup>7</sup> The scope excludes MHPs that declined to participate in the Program and the corresponding space total was calculated from the MHP’s permit-to-operate, rather than the SED-prioritized list of eligible MHPs. A confidential list of completed and in-progress projects has been provided to the CPUC’s Energy Division and Safety and Enforcement Division.

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, in accordance with the Decision, SED provided a new priority list of eligible parks. The list comprised 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 is currently in the process of developing a comprehensive schedule with 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 2023, and it will continue to develop its schedule through 2025 to incorporate all Category 1 MHP’s moving forward, reprioritizations requested by SED, and request replacements for MHP’s declining to move forward.

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



#### **4. Program Assessment**

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

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

Despite the issues faced in 2020 and 2021, the SDG&E Mobilehome Park Utility Conversion Program continues to be successful, as noted in Decision 20-04-004 and demonstrated by the following performance indicators:

##### **Program Penetration**

SDG&E has successfully partnered with MHP Owners/Operators and, as of December 31, 2021, completed nearly 19% of the eligible mobilehome spaces in SDG&E's service territory.

##### **Safety Performance**

From 2014 through 2019, SDG&E maintained a high safety standard with no reportable incidents over approximately 430,000 hours of labor logged between contractors and MHP program employees combined. In 2020, SDG&E continued to maintain a high safety standard with one reportable contractor first-aid incident over approximately 81,000 hours. SDG&E was incident free in 2021 over approximately 74,000 hours of labor for contractors and MHP program employees combined. Additionally, 59 MHPs with systems older than 40 years have received – or are in the process of receiving – new utility-owned and maintained distribution systems that meet current SDG&E standards.

##### **Customer Satisfaction**

In response to customer satisfaction surveys in 2021, , SDG&E achieved a satisfaction rate of 100% with MHP owners/operators/Managers, and 56% with MHP residents.

## 5. Conclusion

This concludes the seventh 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>.<sup>8</sup>

---

<sup>8</sup> 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: 1/1/2021 to 12/31/2021  
Start Date End Date

 Executed on: 1/31/2022  
Signature of Officer Month, Day, Year

David Buczkowski  
Print Name

Vice President of Gas Distribution  
Title





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

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

I, Robert Pisaneschi, do declare as follows:

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

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

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

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

Executed this 31<sup>st</sup> day of January, 2022 at Los Angeles, California.

*Robert B Pisaneschi*

\_\_\_\_\_  
Robert Pisaneschi  
MHP & Capital Gas Construction Manager

# ATTACHMENT A

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

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