



A  Sempra Energy utility

**Mobilehome Park Utility Upgrade Program
Annual Report**

PUBLIC VERSION

February 1, 2021

SOCALGAS MOBILEHOME PARK UTILITY UPGRADE PROGRAM

FEBRUARY 1, 2021 ANNUAL REPORT

TABLE OF CONTENTS

Page

1. Executive Summary	2
2. Procedural History	2
3. Cost Accounting	3
4. Program Timeline	12
5. Program Assessment	13
6. Conclusion	14

SOCALGAS MOBILEHOME PARK UTILITY UPGRADE PROGRAM

FEBRUARY 1, 2021 ANNUAL REPORT

1. Executive Summary

As detailed in this Report, SoCalGas continues to successfully implement the extended Mobilehome Park Pilot Program. As of December 31, 2020, SoCalGas has converted 263 mobilehome neighborhoods (17,787 permitted spaces), which is approximately 13% of eligible mobilehome spaces in SoCalGas' service territory.

2. Procedural History

On March 13, 2014, the California Public Utilities Commission ("Commission") approved and authorized Southern California Gas Company ("SoCalGas") to execute the Mobilehome Park Utility Upgrade 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").¹ SoCalGas 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 SoCalGas 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.) 18-04-018.² Eligible MHPs were defined as those where SoCalGas 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.

¹ Resolution E-4878, ordering paragraph (OP) 7.

² Resolution E-4958, OP 1.

On April 16, 2020, the Commission issued D.20-04-004, approving a ten-year Mobilehome Park Utility Conversion Program beginning in 2021 through 2030. Following a new application period established by the Commission during the 1st quarter of 2020, SED will provide SoCalGas, 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, and determine whether the development of an electrification ready service standard for participating MHPs was feasible. The Proposed Decision on Consumer Protections is expected around July 2021, with the Proposed Decision on Electrification Standards expected in December 2021.

This report is submitted in the format requested by the Commission’s Safety and Enforcement Division (“SED”).³ Previous reports were submitted in accordance with D.14-03-021 Ordering Paragraph (OP) 10, which directs each electric and/or gas utility to prepare a status report for the Program on February 1 of each year. SoCalGas filed its first, second, third and fourth, and fifth status reports on February 1 of 2016, 2017, 2018, 2019, and 2020 respectively. In SoCalGas’ February 1, 2016 report, SoCalGas 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. SoCalGas 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, and February 1, 2020 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, 2020 for which final costs

³ 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.

have been recorded.⁴ 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.⁵ Table 2 below shows the associated revenue requirements and rate impacts.

TABLE 1: ANNUAL REPORT TEMPLATE

- Bolded words in "Descriptor" column were added by SoCalGas 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
Program Participation							
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	-	16	689	1,384	881	4,019
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	-	1	5	6	15	25

⁴ 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.

⁵ “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	2015	2016	2017	2018	2019	2020
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.	-	-	2,116	2,528	842	2,318
Rural Community ⁶	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within rural community	-	-	-	-	-	-
Urban Community ⁷	Number of converted spaces (i.e., PTO count, not directly corresponding with the costs below) within urban community	-	47	3,092	5,390	3,852	2,719
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)		-	150	3,608	4,373	3,166	5,847

⁶ The Census Bureau identifies two types of urban areas: (1) Urbanized Areas (UAs) of 50,000 or more people, and (2) 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/programs-surveys/geography/guidance/geo-areas/urban-rural.html>

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
	Number of TTM MH and Covered Common Area Locations Converted (Electric)	N/A	N/A	N/A	N/A	N/A	
	Number of BTM MH Converted Register Spaces (Gas)	-	98	3,108	3,891	2,724	5,543
	Number of BTM MH Converted Register Spaces (Electric)	N/A	N/A	N/A	N/A	N/A	
Cost Information							
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		N/A	N/A	N/A	N/A	N/A	N/A
Gas		-	139,518	10,546,283	15,327,060	9,193,554	16,875,492
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 SoCalGas, no gas design costs were previously incorporated in this line item)	-	59,789	3,962,676	5,923,946	2,843,685	7,269,877
Material / Structures	Pipes, fittings and other necessary materials required for gas construction	-	59,839	1,578,224	1,904,013	788,075	1,506,150

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
Electric System							
Labor	Cost for installation of distribution Electric assets, pre-inspection testing, decommissioning of legacy system (Electric Design cost was previously incorporated here)	N/A	N/A	N/A	N/A	N/A	N/A
Material / Structures	Cables, conduits, poles, transformers and other necessary materials for electrical construction	N/A	N/A	N/A	N/A	N/A	N/A
Design/Construction Management	Cost for engineering, design and construction inspection cost	-	110,819	4,996,415	7,064,935	3,736,071	11,920,568
Other							
Labor (Internal)	Meter installation, gas relights, easements, environmental desktop reviews and other support organizations, including legacy system decommissioning internal labor	-	6,643	386,124	349,283	205,912	339,329
Other Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
Non-Labor	Permits, vehicle utilization, payment discounts, consultant support (e.g., environmental monitoring)	-	1,077	211,359	-3,427	100,062	-66,858
Materials	meters, modules and regulators	-	16,243	391,443	477,366	344,025	381,616
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						

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
	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)	-	28,882	1,229,092	1,721,811	894,562	2,172,426
Outreach		-	-	-	-	-	-
Other							
Property Tax	Property tax on capital spending not yet put into service	-	89.57	19,802	23,032	17,439	42,325
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.	-	1,813	165,230	169,407	134,130	285,440
Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
Non-Labor	Utility specific overhead driven by corporate cost model	-	12,939	754,857	1,028,567	658,622	1,510,204
Sub-Total Capital Cost		-	437,653	24,241,504	33,985,993	18,916,138	42,236,570
To The Meter - Expense Costs							
Project Management Costs							
Project Management Office (PMO)	Program startup cost, program management activities associated with Outreach or	-	2,624	132,938	206,422	101,690	261,620

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
	other non-capital activities						
Outreach	Outreach efforts to educate MHP Owners, residents, government and local agencies about the program	-	4,244	199,319	126,655	63,821	164,016
Other							
Labor (Internal)	Program startup cost for supporting organizations, meter removal	-	502.73	6,789	19,307	7,738	14,545
Other Labor (Internal)	Construction management expenses costs (e.g., training, supplies)	-	8,342	427,363	819,758	406,004	1,424,907
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	-	420.55	15,159	22,401	-145,718	15,006
Sub-Total To The Meter		-	16,133	781,569	1,194,543	433,535	1,880,095
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)	-	-	-	-	-	-
Electric System							
Labor	Labor and material for installing BTM Electric infrastructure (e.g. Pedestal, foundation, meter protection, grounding rods, conduit)	N/A	N/A	N/A	N/A	N/A	N/A
Material / Structures		N/A	N/A	N/A	N/A	N/A	N/A

Annual Report Template		Per-year costs; (not cumulative)					
	Descriptor	2015	2016	2017	2018	2019	2020
Gas System							
Labor	Labor and material for installing BTM Gas infrastructure (e.g. houselines, meter protection, foundation)	-	69,029	6,369,736	10,755,064	4,443,364	9,616,207
Material / Structures		-	99,436	2,401,646	2,886,455	1,502,829	4,431,900
Other							
Other Labor (Internal)		N/A	N/A	N/A	N/A	N/A	N/A
Other Non Labor	BTM Permits, including HCD fees	-	18,183	721,461	1,387,010	835,545	1,668,539
Sub-Total Beyond The Meter		-	186,648	9,492,843	15,028,528	6,781,738	15,716,646
Total TTM & BTM		-	640,434	34,515,915	50,209,063	26,131,411	59,833,311

TABLE 2: RATE IMPACT AND REVENUE REQUIREMENT

- Rate impact and revenue requirements are reported based on actual revenue requirement filings for 2015-2021 (i.e., not based on year of financial closure); 2022-2026 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 2015-2020 and 2) the Present Value of revenue requirements for 2021-2026 discounted to 2020 nominal dollars using SoCalGas' rate of return (7.3%). SoCalGas does not typically calculate present value of total revenue requirements for ratemaking 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 thousands 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	
Gas												
Average Rate w/o MMBA recovery - Core	N/A	\$0.65217	\$0.57379	\$0.59324	\$0.60503	\$0.82348	\$0.82348	\$0.82348	\$0.82348	\$0.82348	\$0.82348	
Average Rate w/ MMBA recovery - Core	N/A	\$0.65241	\$0.57395	\$0.59465	\$0.60890	\$0.82735	\$0.82735	\$0.82854	\$0.82944	\$0.82940	\$0.82919	
Rate Change - Core	N/A	\$0.00024	\$0.00016	\$0.00140	\$0.00386	\$0.00387	\$0.00387	\$0.00506	\$0.00597	\$0.00592	\$0.00571	
% Rate Change - Core	N/A	0.04%	0.03%	0.24%	0.64%	0.47%	0.47%	0.61%	0.72%	0.72%	0.69%	
Average Rate w/o MMBA recovery - Non-Core	N/A	\$0.02330	\$0.02549	\$0.02956	\$0.03113	\$0.04658	\$0.04658	\$0.04658	\$0.04658	\$0.04658	\$0.04658	
Average Rate w/ MMBA recovery - Non-Core	N/A	\$0.02331	\$0.02550	\$0.02961	\$0.03129	\$0.04674	\$0.04674	\$0.04678	\$0.04681	\$0.04681	\$0.04680	
Rate Change - Non-Core	N/A	\$0.00001	\$0.00001	\$0.00005	\$0.00016	\$0.00016	\$0.00016	\$0.00020	\$0.00023	\$0.00023	\$0.00022	
% Rate Change - Non-Core	N/A	0.04%	0.03%	0.18%	0.52%	0.33%	0.34%	0.43%	0.50%	0.49%	0.48%	
Electric												
Average Rate w/o MMBA recovery - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Average Rate w/ MMBA recovery - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Rate Change - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
% Rate Change - Total System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Revenue Requirement (In Millions)												
Gas Revenue Requirement-TTM	\$0.000	\$0.850	\$0.617	\$3.602	\$9.505	\$9.200	\$10.961	\$14.094	\$14.315	\$13.954	\$13.545	\$71.441
Electric 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
Gas Revenue Requirement-BTM	\$0.000	\$0.000	\$0.000	\$1.740	\$5.232	\$5.517	\$8.277	\$8.576	\$8.190	\$7.757	\$7.304	\$41.860
Electric 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

4. Program Timeline

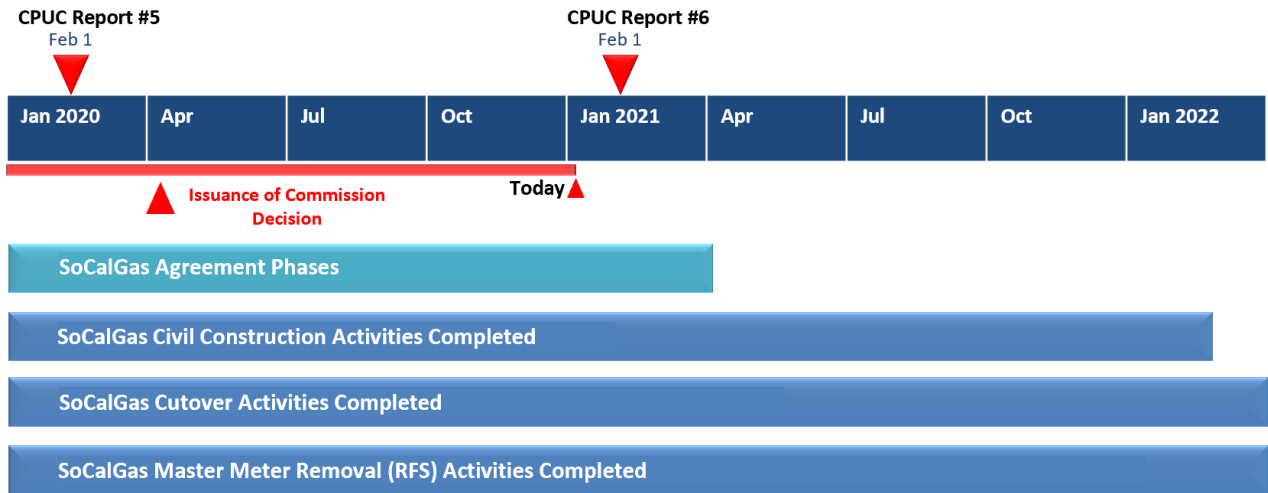
Pursuant to Resolution E-4878, SoCalGas achieved its initial Pilot Program target of 10% in 2018 and continued conversions of up to an additional 5% of MHP spaces by December 31, 2020. As of December 31, 2020, SoCalGas has converted 263 MHPs (17,787 permitted spaces), which is approximately 13% of eligible mobilehome spaces in SoCalGas' service territory.⁷

SoCalGas has measured its progress against the timeline shown in Figure 1 ("SoCalGas' Tentative Timeline for Implementation of the Extended Pilot and Current Status") below. In developing the timeline, SoCalGas 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, SoCalGas has substantially completed all eligible MHP upgrades in the fourth quarter of 2020. 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 from SED is needed within the second quarter of 2021 in order to avoid unnecessary costs as a result of delays in outreach, design, and construction activities.

⁷ The scope excludes MHPs that declined to participate in the Program and the corresponding space total was calculated from the MHP permits-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 Enforcement Division.

FIGURE 1: SoCalGas' Tentative Timeline for Implementation of the Extended Pilot and Current Status



5. Program Assessment

The purpose of implementing the Program was to conduct a pilot during which IOUs and the Commission could assess the feasibility and effectiveness of a mobilehome park conversion program as outlined in the Ordering Paragraphs of D.14-03-021. D.14-03-021, Resolution E-4878 and Resolution E-4958 authorized IOUs to implement the Pilot Program to convert approximately 10%, 5%, and conversion amounts pursuant to the extension limitations contained in Resolution E-4958, respectively, of master-metered/sub-metered services at mobilehome parks to direct utility service.

In March of 2020, the World Health Organization (WHO) declared COVID-19 a pandemic and in response, SoCalGas has instituted various hygiene measures, social distancing protocols, and alternate outreach and education methods in support of 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 shift 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, the SoCalGas Pilot Program continues to be successful, as noted in Decision 20-04-004, and as demonstrated by the following performance indicators:

Program Penetration

SoCalGas has successfully partnered with MHP Owners/Operators and, as of December 31, 2020, completed approximately 13% of the eligible mobilehome spaces in SoCalGas' service territory.

Safety Performance

From 2014 through 2019, SoCalGas maintained a high safety standard with four reportable incidents over approximately 1,520,000 hours of labor logged between contractors and MHP program employees combined. In 2020, SoCalGas continued to maintain a high safety standard with zero reportable incidents over approximately 190,460 hours. Additionally, 263 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 SoCalGas standards.

Customer Satisfaction

In response to customer satisfaction surveys in 2020, SoCalGas achieved a satisfaction rate of 83% with MHP residents and 89% with MHP owners/operators.

6. Conclusion

This concludes the sixth annual filing in accordance with SED's instructions.

Additional Program information can be found online on SoCalGas' website at: <https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/pipeline-safety/mobilehome-park-utility-conversion-program>.

This annual report may be accessed at: <https://www.socalgas.com/regulatory/A17-05-007>.⁸

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



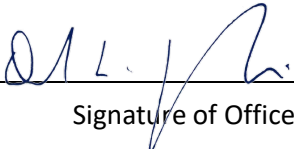
A Sempra Energy utility®

**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 Southern California Gas Company (SoCalGas), I hereby certify that the Mobilehome Park Utility Upgrade Program Annual Report generated in compliance with D.14-03-021 is accurate.

Reporting Period: January 1, 2020 to December 31, 2020
Start Date End Date

 Executed on: 1/26/2021
Signature of Officer Month, Day, Year

David Buczkowski VP of Gas Distribution
Print Name Title

Confidential and Protected Materials (highlighted) are provided pursuant to Public Utilities Code Section 583, General Order 66-D, D.17-09-023, and the accompanying confidentiality declaration.

SoCalGas 2020 Annual Report List of Active Parks

*Financial Completion: project costs have been recorded and any remaining costs not recorded are estimated to fall within 5% of total project costs

**Construction Completion: cutover completed and master meter removed; final costs have not been recorded

***PTO (Permit to Operate) counts may not represent actual spaces in scope for conversion

HCD ID	NAME	STATUS	CITY	COUNTY	PTO COUNT***	GAS IOU	ELECTRIC IOU
		Financially complete*		ORANGE		SoCalGas	N/A
		Financially complete*		SAN LUIS OBISPO		SoCalGas	PG&E
		Financially complete*		LOS ANGELES		SoCalGas	N/A
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially complete*		SAN BERNARDINO		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		SAN BERNARDINO		SoCalGas	N/A
		Financially complete*		RIVERSIDE		SoCalGas	N/A
		Financially complete*		SAN BERNARDINO		SoCalGas	N/A
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		LOS ANGELES		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		RIVERSIDE		SoCalGas	SCE
		Financially complete*		ORANGE		SoCalGas	SCE
		Financially complete*		ORANGE		SoCalGas	SCE

	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	TULARE	SoCalGas	N/A
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	ORANGE	SoCalGas	SCE
	Financially complete*	ORANGE	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	ORANGE	SoCalGas	SCE
	Financially complete*	ORANGE	SoCalGas	SCE
	Financially complete*	ORANGE	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	KERN	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	TULARE	SoCalGas	SCE
	Financially complete*	TULARE	SoCalGas	SCE
	Financially complete*	TULARE	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE

Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN DIEGO	SoCalGas	SDG&E
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	SANTA BARBARA	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SANTA BARBARA	SoCalGas	PG&E
Financially complete*	SANTA BARBARA	SoCalGas	PG&E
Financially complete*	SANTA BARBARA	SoCalGas	PG&E
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	VENTURA	SoCalGas	SCE
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	N/A

Financially complete*	ORANGE	SoCalGas	N/A
Financially complete*	SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*	LOS ANGELES	SoCalGas	N/A
Financially complete*	KERN	SoCalGas	PG&E
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	SANTA BARBARA	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	ORANGE	SoCalGas	SCE
Financially complete*	LOS ANGELES	SoCalGas	SCE
Financially complete*	SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*	TULARE	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	N/A
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	RIVERSIDE	SoCalGas	SCE
Financially complete*	SAN LUIS OBISPO	SoCalGas	PG&E
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	SCE
Financially complete*	SAN BERNARDINO	SoCalGas	N/A

	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	ORANGE	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	SAN BERNARDINO	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Construction Complete*	VENTURA	SoCalGas	SCE
	Declined	KERN	SoCalGas	PG&E
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	In progress	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Construction Complete*	KINGS	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	RIVERSIDE	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Financially complete*	LOS ANGELES	SoCalGas	SCE
	Construction Complete*	SANTA BARBARA	SoCalGas	PG&E

Financially complete*	AN BERNARDINO	SoCalGas	SCE
In progress	IVERSIDE	SoCalGas	SCE
Financially complete*	IVERSIDE	SoCalGas	SCE
Financially complete*	RANGE	SoCalGas	SCE
Financially complete*	OS ANGELES	SoCalGas	SCE
Financially complete*	AN BERNARDINO	SoCalGas	SCE
Financially complete*	AN BERNARDINO	SoCalGas	SCE
In progress	ENTURA	SoCalGas	SCE
Financially complete*	OS ANGELES	SoCalGas	SCE
Financially complete*	OS ANGELES	SoCalGas	SCE
Financially complete*	OS ANGELES	SoCalGas	SCE
In progress	ULARE	SoCalGas	SCE
Financially complete*	AN BERNARDINO	SoCalGas	SCE
Financially complete*	OS ANGELES	SoCalGas	N/A
Financially complete*	ERN	SoCalGas	SCE
Financially complete*	AN BERNARDINO	SoCalGas	SCE
Financially complete*	AN BERNARDINO	SoCalGas	SCE
Financially complete*	AN BERNARDINO	SoCalGas	SCE
Financially complete*	RANGE	SoCalGas	SDG&E
Financially complete*	IVERSIDE	SoCalGas	SCE
Financially complete*	RANGE	SoCalGas	SCE
Financially complete*	ANTA BARBARA	SoCalGas	N/A
Financially complete*	ANTA BARBARA	SoCalGas	PG&E
Financially complete*	ENTURA	SoCalGas	SCE
Financially complete*	RANGE	SoCalGas	SCE
Financially complete*	ERN	SoCalGas	SCE
Financially complete*	RANGE	SoCalGas	SCE
Financially complete*	AN BERNARDINO	SoCalGas	SCE
In progress	AN BERNARDINO	SoCalGas	GO
Financially complete*	AN BERNARDINO	SoCalGas	SCE
In progress	IVERSIDE	SoCalGas	N/A
In progress	AN BERNARDINO	SoCalGas	N/A
In progress	RANGE	SoCalGas	SDGE
In progress	OS ANGELES	SoCalGas	N/A
In progress	RANGE	SoCalGas	SCE
In progress	IVERSIDE	SoCalGas	N/A
In progress	ANTA BARBARA	SoCalGas	N/A
In progress	RANGE	SoCalGas	SCE
In progress	AN BERNARDINO	SoCalGas	SCE
In progress	RANGE	SoCalGas	SCE
In progress	IVERSIDE	SoCalGas	SCE
In progress	RANGE	SoCalGas	SCE

[Redacted] In progress
[Redacted] In progress
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[Redacted] In progress
[Redacted] In progress
[Redacted] In progress
[Redacted] Financially complete*
[Redacted] In progress
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[Redacted] In progress
[Redacted] In progress
[Redacted] In progress

[Redacted]	LOS ANGELES	[Redacted]	SoCalGas	SCE
[Redacted]	LOS ANGELES	[Redacted]	SoCalGas	SCE
[Redacted]	RIVERSIDE	[Redacted]	SoCalGas	SCE
[Redacted]	SAN BERNARDINO	[Redacted]	SoCalGas	SCE
[Redacted]	SAN BERNARDINO	[Redacted]	SoCalGas	SCE
[Redacted]	RIVERSIDE	[Redacted]	SoCalGas	SCE
[Redacted]	ORANGE	[Redacted]	SoCalGas	SCE
[Redacted]	LOS ANGELES	[Redacted]	SoCalGas	SCE
[Redacted]	LOS ANGELES	[Redacted]	SoCalGas	SCE
[Redacted]	VENTURA	[Redacted]	SoCalGas	SCE
[Redacted]	ORANGE	[Redacted]	SoCalGas	SCE
[Redacted]	RIVERSIDE	[Redacted]	SoCalGas	SCE
[Redacted]	RIVERSIDE	[Redacted]	SoCalGas	SCE
[Redacted]	SAN BERNARDINO	[Redacted]	SoCalGas	SCE
[Redacted]	ORANGE	[Redacted]	SoCalGas	SCE
[Redacted]	ORANGE	[Redacted]	SoCalGas	SCE
[Redacted]	LOS ANGELES	[Redacted]	SoCalGas	SCE
[Redacted]	LOS ANGELES	[Redacted]	SoCalGas	SCE

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

**DECLARATION OF MARIO AGUIRRE
REGARDING CONFIDENTIALITY OF CERTAIN DATA
PURSUANT TO D.17-09-023**

I, Mario Aguirre, do declare as follows:

1. I am the Distribution PMO and Resource Management Director for Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by David Buczkowski, Vice President of Gas Distribution. I have reviewed the document titled “SCG 2021 Annual Rpt – List of Active Parks.xlsx” (the “SCG Active Park List”). 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.”) 17-09-023 to demonstrate that the yellow-highlighted confidential information (“Protected Information”) provided in the SCG 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 the 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 31st day of January, 2021 at Los Angeles, California.



Mario Aguirre
Director
Distribution PMO and Resource Management

ATTACHMENT A

SoCalGas Request for Confidentiality on the following information contained in SCG Active Park List

Type and Location of Protected Information	Legal Authority	Narrative Justification
<p>Yellow-highlighted cells in the SCG 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"> • 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 § 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>