



*Pacific Gas and
Electric Company*[®]



Mobilehome Park Utility Conversion Program 2024 Report to the California Public Utilities Commission

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PUBLIC VERSION

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM
2024 REPORT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION

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A. Mobilehome Park Utility Conversion Program Overview

1. Executive Summary

Through the California Public Utilities Commission's (CPUC or Commission) Mobilehome Park Utility Conversion Program (UCP or Program), participating utilities work to replace mobilehome park (MHP) owned and operated utility systems with direct public utility gas and electric service for individual MHP residents. Decision (D.) 20-04-004 directed Pacific Gas and Electric Company (PG&E) to convert approximately 2.5 percent of mobilehome spaces in its service territory annually with an annual soft cap of \$80 million dollars. PG&E has met this requirement in 2024. This report provides a programmatic review of 2024's trends, spending, and conversions in the Program.

2. Procedural History

On March 14, 2014, the Commission issued D.14-03-021, approving a three year "living pilot" Program (Pilot) to convert 10 percent of MHP spaces in California from master-meter service to direct utility service.¹

PG&E filed Advice Letters 3822-G/5033-E, 3822-G-A/5033-E-A, 3822-G-B/5033-E-B on March 17, 2017, March 28, 2017, and August 10, 2017, respectively, to confirm completion of the Pilot Program and request to continue the Program beyond 2018 consistent with Commission direction. These were subsequently approved in Resolution E--4878, allowing PG&E to continue its MHP Pilot until the earlier of either December 31, 2019, or the issuance of a Commission decision for the continuation, expansion, or modification of the program beyond December 31, 2019. The number of spaces converted in 2018 and 2019 was not to exceed the levels specified in each IOU's respective advice letter filings.

On March 18, 2019, Resolution E-4958 authorized all participating electric and gas utilities to continue their MHP Pilot 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.

¹ D.14-03-021.

On April 16, 2020, the Commission issued D.20-04--004, establishing a 10--year MHP UCP, beginning in 2021, which modified certain eligibility, annual target conversion rates, and cost targets from the Pilot.

On December 19, 2024, D.24-12-037 to adopt a 200-amp electric service standard for the existing MHP UCP. D.24-12-037 only applies to parks that have not yet been converted, and does not apply retroactively to parks that have already signed MHP UCP agreements or have already completed design or construction.

3. Program Vision

Working with the CPUC's Safety Enforcement Division (SED) and the California Department of Housing and Community Development (HCD), PG&E will provide safe, and reliable energy for MHP residents.

4. Report Objectives

Pursuant to D.20-04-004,² PG&E uses the Revised Annual Report Template to prepare an annual report for the MHP UCP.³ This annual report is a comprehensive accounting of the 2024 year and includes:

- A narrative assessment of the MHP Program.
- An updated conversion data and financials displayed with the use of Table 5 in D.20-04-004.
- An updated list of all MHP conversions completed, including city and county, space count, gas utility company and electric utility company performing each conversion.

5. Program Timeline and Current Progress

PG&E completed its second full year of the MHP UCP in 2023, after transitioning from the Pilot in 2021. As of December 31, 2024, PG&E has completed 193 MHP projects, which includes 16,544 permitted mobilehome spaces.

As of January 17, 2025, there are 204 active parks in PG&E's portfolio in different project phases:

² D.20-04-004, Ordering Paragraph 10.

³ D.20-04-004, Appendix B, Table 5: New Annual Report Data Template.

- 1) Outreach (115 parks);
- 2) Planning (7 parks);
- 3) Application (30 parks);
- 4) Design (24 parks);
- 5) Construction (23 parks); and
- 6) Closeout (5 parks).

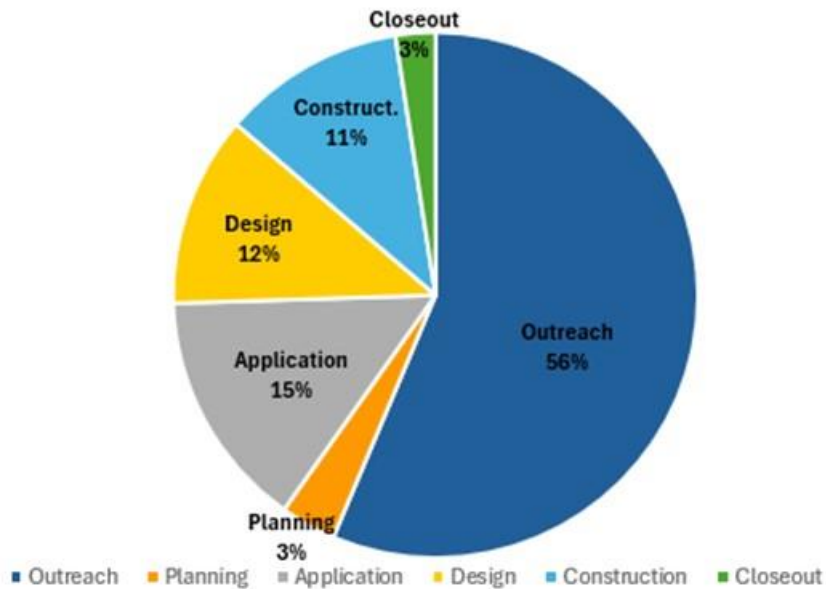


Figure 1: PG&E 2025 MHP UCP Portfolio Breakdown

The 115 parks in the outreach phase do not have forecasted schedules as they will be determined upon the beginning of the planning phase. The schedule is subject to change and assumes that there are no obstacles to prevent an MHP’s participation in the Program, such as the MHP owner’s ability and willingness to: (1) complete and move forward with a detailed application, (2) execute the Program Agreement, (3) grant the required easements, (4) secure a qualified Beyond-The-Meter (BTM) contractor, (5) finance the BTM construction activities and To-The-Meter (TTM) scope that are not covered under D.20-04-004, as well as (6) meet the prescribed program schedule.

Further assumptions include, but are not limited to, the total number of MHP spaces indicated on the Form of Intent completed by the MHP owners is accurate, the ability for a joint schedule to be developed, accepted, and executed by all impacted utilities where shared territory requires joint

construction. The schedule is further dependent on availability of both TTM and BTM contractors having qualified crews to perform construction and HCD and/or other jurisdictional agencies having available trained resources to perform timely inspections on completed portions of the projects. PG&E's schedule is expected to change throughout the Program's life.

PG&E has successfully concluded outreach to all parks designated by the CPUC in Category 1 and is working to initiate the planning phase for the last of these parks. PG&E has also begun soliciting applications from Category 2 parks and successfully contacted 115 of the 418 parks listed, as of December 31, 2024.

5.1 Potential Delays

Going forward, PG&E anticipates several factors may begin, or continue, impacting the pace of conversion as PG&E progresses through the remaining MHPs on the SED's prioritization list, discussed below.

5.1.1 Supply Chain Delays

Construction schedules continue to be impacted by supply chain delays, as highlighted in last year's annual report. To date, pedestal and transformers availability appears to be the most significant of all material delays, with lead times exceeding 52 weeks at times. Furthermore, manufacturers and/or distributors have occasionally changed committed delivery dates with little notice, making it difficult to find alternative models or develop plans to mitigate delays.

Electric pedestals are classified as a BTM material. The MHP owner and the BTM contractor are responsible for procurement and installation. As the contractual relationship is between the MHP Owner and their choice of BTM contractor, this limits PG&E's intervention or ability to mitigate delays. PG&E will continue to partner with the owner and their representatives to the best of their ability.

Additional delays could materialize due to the adoption of the 200-amp standard. As of December 19, 2024, the CPUC ratified D.24-12-037 that mandates the implementation of a 200-amp electric service standard in place of the previous 100-amp standard. PG&E has been

re-evaluating program execution timelines to procure the 200-amp pedestals. PG&E anticipates an increase in lead times as manufacturers increase 200-amp pedestal production.

5.1.2 Santa Nella Utility Conversion Project (SNUC Project)

On April 27, 2023, the Commission issued D.23-04-057 to address the potential loss of natural gas service for a portion of the Santa Nella MHP, whose private master metered gas provider, SNME Inc., was experiencing financial difficulties. The Decision ordered the conversion of the SNME gas system from master metered service to direct metered service.⁴ Simultaneously, both the TTM infrastructure and BTM infrastructure will be upgraded to accommodate 200-amp electric service to each home.⁵ PG&E's MHP UCP will complete this work with resources, budget and scheduling originally allocated to the conversion of parks on the CPUC priority list.

As of December 2024, PG&E has been actively collaborating to develop a planning and design framework for approval of new installations. The design walk has been completed for both Santa Nella and the portion of MHP where all gas and electric meters have been in front of the homes. Additionally, the customer outreach team has conducted door-door visits to provide residents with project updates, share the latest status and collect new applications from residents with pending submissions. Planning and design completion is anticipated in 2025.

5.1.3 Recreational Vehicles and Park Models

Recreational vehicles (RV) and park trailers fall outside the inspection jurisdiction of HCD. Many mobilehome parks include RVs and park trailers occupying permitted mobilehome spaces. Due to these units being outside of the HCD jurisdiction, the lack of HCD inspection for these units present challenges in ensuring compliance with PG&E Gas Service Record (GSR) requirements. PG&E GSRs will not supply a gas meter to spaces that do not pass HCD inspection. As a result, it

⁴ D.23-04-057, Ordering Paragraph 1.

⁵ D.23-04-057, Ordering Paragraph 2.

has become increasingly difficult to pass inspection and provide direct gas service to these spaces.

5.1.4 HCD Jurisdiction Inspection Concerns

Throughout the year, the PG&E team has encountered inconsistencies with HCD inspections, particularly regarding bollards, inspection scheduling, rule enforcement and the clarity of installation guidelines. For example, bollards are installed according to PG&E standards – less than 3 feet away from driveways for electric equipment and less than 8 feet for gas equipment. However, HCD guidelines only state that equipment must be protected from vehicular damage in a manner that meets that approved by the enforcement agency, without providing specific details on how this protection should be implemented. Additionally, inspection delays have occurred due to a shortage of inspectors and requirements for additional inspections during cutovers, further impacting timelines. .

5.2 Programmatic Implementation

PG&E collaborated with the Commission on the following matters of programmatic implementation:

5.2.1 Gas Stubs

The MHP UCP Agreement indicates that vacant mobilehome spaces will receive a stub to the location of the future “Service Delivery Point”.⁶

In recent discussions with CPUC Staff, PG&E has highlighted its concerns for the Commission to consider modification of the MHP UCP Agreement in the upcoming revision window expected to begin in 2025 to forego the gas stub all together. PG&E will continue to install these stubs, in compliance, until further notice. For the year of 2024, gas stubs have been implemented and installed in all parks converted during this period. The gas stub installation requires additional fittings, such as ETS and other materials, to leave a 3-foot stub, which is considered costly for vendors and requires sourcing additional materials. PG&E continues the need for a modification to the MHP UCP agreement

⁶ D.20-04-004, p. 224.

during the upcoming revision window, expected to begin in 2025. Specifically, PG&E recommends eliminated the gas stub requirement for vacant spaces to address cost concerns and reduce safety risks for idle facilities. Until further guidance, PG&E will proceed with installing short gas extensions in compliance with current agreement.

5.2.2 Existing Distribution System (Legacy System)

The MHP UCP agreement requires park owners to operate and maintain the existing legacy distribution system, ensuring ongoing maintenance. However, the absence or poor quality of records has created challenges for compliance with the UCP. Identifying the type and ownership of underground lines has proven difficult. PG&E remains committed to working with MHP owners to locate and identify these underground facilities. Additionally, there is a heightened safety risk associated with excavating unmarked or unmapped areas and potentially encountering energized Lines. PG&E recommends including additional language in the MHP agreement requiring park owners to provide accurate maps. Alternatively, the CPUC could consider a decision to allocate additional funding to cover exploration costs, given the increased liability faced by EPC vendors.

6. Cost Assessment

Attachment 1 (“Annual Report Template”) reflects the space counts and costs of projects through December 31, 2024. These costs are believed to be all inclusive, subject to any potential trailing costs.⁷

B. Conclusion

Pursuant to D.14-03-021, Ordering Paragraph 8, a reasonableness review of all completed Program projects is performed in PG&E’s General Rate Case (GRC). For further details regarding specific projects from Program inception through December 31, 2017, please refer to PG&E’s 2020 GRC.⁸ For projects completed between January 1, 2018, and December 31, 2020, please refer to

⁷ Trailing costs include, but are not limited to, contractor invoices, internal labor charges, or other costs which may not have been received within PG&E’s closing period.

⁸ A.18-12-009, PG&E 2020 GRC, Exhibit (PG&E-12), Chapter 13 (Revised June 18, 2019).

PG&E's filing in Track 2 of its 2023 GRC.⁹ PG&E will be submitting specific project details for all projects completed between 2021 and 2024 in PG&E's 2027 GRC.

⁹ A.21-06-021, PG&E 2023 GRC, Track 2 Prepared Testimony, Chapter 5.

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2024
REPORT TO THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
ATTACHMENT 1
ANNUAL REPORT TEMPLATE

Annual Report Template*	Per-year costs, not cumulative									
	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Program Participation										
CARE/FERA enrollment	0	112 Customers	378 Customers	1,331 Customers	343 Customers	689 Customers	525 Customers	752 Customers	876 Customers	632 Customers
Medical Baseline	0	13 Customers	100 Customers	69 Customers	53 Customers	85 Customers	33 Customers	82 Customers	53 Customers	74 Customers
Disadvantaged Community	0	77	139	1,395	137	618	491	543	490	317
Rural Community**	0	49	26	27	1,248	0	0	0	453	417
Urban Community**	0	211	974	3,342	2,465	846	941	1,547	1,547	1,089
Leak Survey (Optional)	0	33	90	370	246	38	65	143	121	176
Completed Spaces***										
Number of TTM/ MH and Covered Common Area Locations Converted (Gas)	0	265	890	3,054	3,535	1,168	828	1,567	2,022	1,450
Number of TTM/ MH and Covered Common Area Locations Converted (Electric)	0	167	844	2,903	3,114	1,123	695	1,412	1,186	1,485
Number of BTM/ MH Converted Register Spaces (Gas)	0	261	856	2,687	3,533	1,108	813	1,547	1,991	1,430
Number of BTM/ MH Converted Register Spaces (Electric)	0	167	818	2,633	2,979	1,057	692	1,411	1,173	1,485
Cost Information										
To the Meter - Capital Costs										
Construction Direct Costs										
Civil/Trenching										
Electric	\$ -	\$ 3,389,445.66	\$ 14,548,355.83	\$ 16,518,576.87	\$ 24,023,811.96	\$ 7,701,185.08	\$ 4,686,453.08	\$ 8,879,333.00	\$ 8,655,372.99	\$ 11,795,608
Gas	\$ -	\$ 5,079,659.15	\$ 17,651,853.52	\$ 14,982,885.92	\$ 25,886,529.08	\$ 5,907,771.56	\$ 5,555,325.60	\$ 9,103,189.91	\$ 13,537,271.39	\$ 59,892,022
Gas System										
Labor	\$ -	\$ 1,846,728.94	\$ 6,417,396.86	\$ 5,447,011.07	\$ 9,411,143.72	\$ 2,147,792.28	\$ 2,012,388.17	\$ 3,309,498.48	\$ 4,921,125.26	\$ 5,596,281
Material/ Structures	\$ -	\$ 533,258.63	\$ 1,893,077.72	\$ 1,572,870.60	\$ 2,717,547.49	\$ 620,193.22	\$ 581,094.13	\$ 955,645.73	\$ 1,421,132.12	\$ 1,038,457
Electric System										
Labor	\$ -	\$ 1,851,374.10	\$ 7,946,564.65	\$ 9,022,733.61	\$ 13,122,223.38	\$ 4,206,521.06	\$ 2,559,822.08	\$ 4,850,045.92	\$ 4,727,715.07	\$ 6,442,966
Material/ Structures	\$ -	\$ 854,710.42	\$ 3,668,632.73	\$ 4,165,459.83	\$ 6,058,041.47	\$ 1,941,994.00	\$ 1,181,774.45	\$ 2,339,085.44	\$ 2,182,609.85	\$ 3,974,477
Design/Construction Management	\$ -	\$ 2,616,623.78	\$ 7,530,961.37	\$ 7,036,482.87	\$ 13,019,473.31	\$ 4,018,563.12	\$ 3,244,477.49	\$ 5,479,522.24	\$ 6,486,102.81	\$ 6,144,078

Annual Report Template*		Per-year costs; not cumulative											
Rate Impact and Revenue Requirement		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024		
Gas	Average Non-CARE Residential Rate w/o MHBPBA recovery - Core (S/therm)	\$ 1,496,570	\$ 1,471,460	\$ 1,597,710	\$ 1,516,020	\$ 1,602,300	\$ 1,602,300	\$ 1,602,300	\$ 1,602,300	\$ 1,602,300	\$ 1,602,300		
	Average Non-CARE Residential Rate w/ MHBPBA recovery - Core (S/therm)	\$ 1,496,660	\$ 1,472,710	\$ 1,597,840	\$ 1,518,670	\$ 1,612,440	\$ 1,613,640	\$ 1,613,290	\$ 1,612,850	\$ 1,612,430	\$ 1,612,010		
	Non-CARE Residential Rate Change - Core (S/therm)	\$ 0.000090	\$ 0.001250	\$ 0.001130	\$ 0.002650	\$ 0.010140	\$ 0.011340	\$ 0.010990	\$ 0.010950	\$ 0.010130	\$ 0.009710		
	% Non-CARE Residential Rate Change - Core	0.01%	0.08%	0.07%	0.17%	0.63%	0.71%	0.69%	0.66%	0.63%	0.61%		
	Average Rate w/ MHBPBA recovery - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
	Average Rate w/ MHBPBA recovery - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
	Average Rate w/ MHBPBA recovery - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
	% Rate Change - Non-Core	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
	Electric												
	Average Rate w/o MHBPBA recovery - Total System	\$ 0.171754	\$ 0.177724	\$ 0.187776	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360	\$ 0.195360		
	Average Rate w/ MHBPBA recovery - Total System	\$ 0.171755	\$ 0.177762	\$ 0.187792	\$ 0.195450	\$ 0.195676	\$ 0.195719	\$ 0.195708	\$ 0.195694	\$ 0.195681	\$ 0.195667		
	Rate Change - Total System	\$ 0.000003	\$ 0.000038	\$ 0.000017	\$ 0.000091	\$ 0.000316	\$ 0.000360	\$ 0.000348	\$ 0.000335	\$ 0.000321	\$ 0.000308		
	% Rate Change - Total System	0.00%	0.02%	0.01%	0.05%	0.16%	0.18%	0.18%	0.17%	0.16%	0.16%		
	Revenue Requirement												
	Gas Revenue Requirement-TTM	\$ 3,008,794	\$ 1,949,069	\$ 4,012,942	\$ 12,653,985	\$ 18,226,604	\$ 19,562,465	\$ 19,192,637	\$ 18,602,911	\$ 18,026,694	\$ 17,463,480		
	Electric Revenue Requirement-TTM	\$ 2,948,668	\$ 1,743,681	\$ 3,709,280	\$ 13,209,572	\$ 18,896,451	\$ 20,344,466	\$ 19,711,265	\$ 19,884,547	\$ 18,472,935	\$ 17,872,307		
	Gas Revenue Requirement-BTM	\$ -	\$ 147,971	\$ 3,256,959	\$ 5,004,983	\$ 8,150,581	\$ 8,440,665	\$ 8,336,032	\$ 7,843,959	\$ 7,351,533	\$ 6,859,156		
	Electric Revenue Requirement-BTM	\$ -	\$ 134,950	\$ 3,384,210	\$ 4,250,109	\$ 7,559,478	\$ 8,356,323	\$ 7,878,868	\$ 7,414,811	\$ 6,950,399	\$ 6,485,997		

*An appendix can be provided to define each category if needed

**The Census Bureau identifies two types of urban areas:

- Urbanized Areas (UAs) of 50,000 or more people;
- Urban Clusters (UCs) of at least 2,500 and less than 50,000 people.

"Rural" encompasses all population, housing, and territory not included with an urban area. The Census Bureau website is: <https://www.census.gov/gso/reference/urban-rural.html>.

****Completed space count includes spaces at parks affected by the Camp Fire that have scope eligible for recovery under the Rule 28 MHP Utility Conversion Program. For 2023, the total TTM + BTM spend does not include the cost associated borne from the Camp Fire parks as it is not available at the time of reporting. Cost accounting will be updated in 2024 annual report.

*****Provide as many labor cost lines with descriptions as needed to clarify types of labor included in project.

*****The credit indicated in 2021 was due to a change order settlement with a vendor on project cost in 2020. Due to the timing of the change order, the cost was not reallocated to the associated capital projects in time within 2020 and was reallocated in 2021, causing a credit in 2021.

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2024
REPORT TO THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
ATTACHMENT 2
MOBILEHOME PARK LIST

HCDID	Category	Park Name	Space Count	Status	Electric Utility	Gas Utility	City	County
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1			Conversion Complete	PG&E	PG&E	SONOMA	SONOMA
	1			Conversion Complete	PG&E	PG&E	HEALDSBURG	SONOMA
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	OAKDALE	STANISLAUS
	1			Conversion Complete	PG&E	PG&E	YUBA CITY	SUTTER
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	RED BLUFF	TEHAMA
	1			Conversion Complete	PG&E	PG&E	DAVIS	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	1			Conversion Complete	PG&E	PG&E	MARYSVILLE	YUBA
	1			Conversion Complete	PG&E	Southern California Gas Company	LOS ALAMOS	SANTA BARBARA
	2			Conversion Complete	PG&E	PG&E	IONE	AMADOR
	2			Conversion Complete	PG&E	PG&E	CHICO	BUTTE
	2			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	2			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	RIO DELL	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	MCKINLEYVILLE	HUMBOLDT
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	2			Conversion Complete	PG&E	PG&E	MERCED	MERCED
	2			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	2			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	2			Conversion Complete	PG&E	PG&E	GRANITE BAY	PLACER
	2			Conversion Complete	SMUD	PG&E	CITRUS HEIGHTS	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	SACRAMENTO	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	STOCKTON	SAN JOAQUIN
	2			Conversion Complete	PG&E	PG&E	MOUNTAIN VIEW	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	ANDERSON	SHASTA
	2			Conversion Complete	PG&E	PG&E	SEBASTOPOL	SONOMA
	2.1			Conversion Complete	SMUD	PG&E	WEST SACRAMENTO	SACRAMENTO
	2.1			Conversion Complete	PG&E	PG&E	SALINAS	MONTEREY
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	3			Conversion Complete	PG&E	PG&E	MADERA	MADERA
	3			Conversion Complete	SMUD	PG&E	ORANGEVALE	SACRAMENTO
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	2			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	CONCORD	CONTRA COSTA
	2			Conversion Complete	PG&E	PG&E	VALLEJO	SOLOANO
	2			Conversion Complete	PG&E	PG&E	MILPITAS	SANTA CLARA
	3			Conversion Complete	PG&E	PG&E	CLOVIS	FRESNO
	2			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	2			Conversion Complete	PG&E	PG&E	PETALUMA	SONOMA
	3			Conversion Complete	SMUD	PG&E	SACRAMENTO	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	LODI	SAN JOAQUIN
	3			Conversion Complete	N/A	PG&E	MARYSVILLE	YUBA
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	3			Conversion Complete	PG&E	PG&E	WEST SACRAMENTO	YOLO
	3			Conversion Complete	SMUD	PG&E	ELK GROVE	SACRAMENTO
	2			Conversion Complete	PG&E	PG&E	UKIAH	MENDOCINO
	2			Conversion Complete	SMUD	PG&E	RANCHO CORDOVA	SACRAMENTO
	3			Conversion Complete	PG&E	PG&E	ANTIOCH	CONTRA COSTA
	3			Conversion Complete	PG&E	PG&E	LODI	SAN JOAQUIN
	3			Conversion Complete	PG&E	PG&E	BAKERSFIELD	KERN
	3			Conversion Complete	PG&E	PG&E	ESPARTO	YOLO
	2			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	2			Conversion Complete	PG&E	PG&E	SAN JOSE	SANTA CLARA
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	2			Conversion Complete	PG&E	PG&E	AUBURN	PLACER
	3			Conversion Complete	Redding Electric Utility	PG&E	REDDING	SHASTA
	BUTTE			Conversion Complete	PG&E	PG&E	PARADISE	BUTTE
	3			Conversion Complete	N/A	PG&E	HYDESVILLE	HUMBOLDT
	1			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	2.1			Conversion Complete	PG&E	PG&E	NAPA	NAPA
	2.1			Conversion Complete	PG&E	PG&E	GRASS VALLEY	NEVADA
	2.1			Conversion Complete	PG&E	PG&E	ROHNERT PARK	SONOMA
	3			Conversion Complete	PG&E	PG&E	OROVILLE	BUTTE
	3			Conversion Complete	PG&E	PG&E	VACAVILLE	SOLOANO
	3			Conversion Complete	PG&E	PG&E	MORGAN HILL	SANTA CLARA
	3			Conversion Complete	PG&E	PG&E	VALLEJO	SOLOANO
	1.2			Conversion Complete	SMUD	PG&E	FOLSOM	SACRAMENTO
	1.2			Conversion Complete	PG&E	PG&E	SANTA ROSA	SONOMA
	1.2			Conversion Complete	PG&E	Southern California Gas Company	GROVER BEACH	SAN LOUIS OBISPO
	1.2			Conversion Complete	PG&E	PG&E	PETALUMA	SONOMA
	1.2			Conversion Complete	PG&E	PG&E	FRESNO	FRESNO
	1.2			Conversion Complete	PG&E	PG&E	PENNGROVE	SONOMA

Note: Some parks affected by the Camp Fire have scope eligible for recovery under the Rule 28 MHP Utility Conversion Program. Scope and associated costs eligible to be covered under the Rule 28 Mobilehome Park Utility Conversion Program Agreement were separated from scope and associated costs covered under the Butte County MHP Rebuild Agreement.

PACIFIC GAS AND ELECTRIC COMPANY
MOBILEHOME PARK UTILITY CONVERSION PROGRAM 2024
REPORT TO THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
ATTACHMENT 3
OFFICER VERIFICATION

VERIFICATION

I, Sandra Cullings, say:

I am an officer of Pacific Gas and Electric Company (PG&E), a California corporation, and am authorized pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the California Public Utilities Commission to make this Verification for and on behalf of PG&E. I have read the foregoing Report and I am informed and believe that the matters therein concerning PG&E are true. Therefore, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Oakland, California, on this 28th day of January 2025.

/s/ _____
Sandra Cullings
Vice President, Portfolio and Program Management