

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Evaluate the
Mobilehome Park Pilot Program and to Adopt
Programmatic Modifications.

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

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

Andrew V. Hall
Assistant General Counsel
8360 South Durango Drive
Las Vegas, Nevada 89113
Telephone: (702) 364-3227
Facsimile: (702) 364-3446
Email: andrew.hall@swgas.com

Attorney for Southwest Gas Corporation

February 1, 2024

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7 **ANNUAL STATUS REPORT**

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

15 Dated this 1st day of February 2024 at Las Vegas, Nevada.

16 Respectfully submitted,
17 SOUTHWEST GAS CORPORATION

18 

19 Andrew V. Hall
20 Assistant General Counsel
21 8360 South Durango Drive
22 Las Vegas, Nevada 89113
23 Telephone: (702) 364-3227
24 Facsimile: (702) 364-3446
25 Email: andrew.hall@swgas.com

Attorney for Southwest Gas Corporation

Southwest Gas Corporation

(U 905 G)

Mobilehome Park Utility Conversion Program Annual Status Report 9

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

Reporting Period:
January 1, 2023 through December 31, 2023

February 1, 2024



I. EXECUTIVE SUMMARY

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

Company Overview

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

II. MHP PROGRAM BACKGROUND AND OVERVIEW

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

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

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

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

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

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

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

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

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

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

III. REPORT

Southwest Gas has prepared and submits its ninth Annual Report using the Annual Report Template adopted in D.20-02-004 and guidance criteria for the period from January 1, 2023 through December 31, 2023 (Reporting Period).

MHP Program Conversion Rate and Status

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

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

⁴ *Id.*, at pg. 40.

⁵ *Id.*, at pg. 41.

⁶ *Id.*, at pgs.40-41.

⁷ *Id.*, at pgs. 49-50.

⁸ *Id.*, OP 10, at pg. 174.

Table 1 (Continued)					
MHP	City	County	Overlapping Electric Utility	# of Spaces	# Spaces Converted
4	South Lake Tahoe			61	61
5	South Lake Tahoe	El Dorado	Liberty	265	265
6	Big Bear Lake	San Bernardino	BVES	250	250
7	Victorville		SCE	48	31
8	Victorville			50	50
9	Victorville			136	69
10	Hesperia			31	31
11	Apple Valley			98	95
12	Victorville			68	67
13	Apple Valley			40	40
14	Barstow			61	39
15	Barstow			92	72
16	Barstow			38	61
17	Barstow			25	25
18	Victorville			104	104
19	Apple Valley			72	72
20	Adelanto			41	41
21	Adelanto			30	30
22	Adelanto			15	15
23	Needles			City of Needles	65
24	Barstow		SCE	32	32
25	Daggett			24	24
26	Victorville			366	366
27	Hesperia			99	99
28	Barstow			264	254
29	South Lake Tahoe	El Dorado	Liberty	18	18
30	South Lake Tahoe	El Dorado	Liberty	9	9
Total Spaces				2,477	2,343

Table 2 below depicts the remaining MHPs⁹ that were prioritized for 2023 and are currently in progress and expected to be converted in 2024.

⁹ Conversion of this MHP began late in 2023. The Beyond the Meter work was delayed due to unavailability of qualified contractors. The conversion is expected to be fully completed by April 2024 and a completion status will be included in Southwest Gas' 2024 Annual Report.

Table 2				
MHP	City	County	Overlapping Electric Utility	# of Spaces
1	Hinkley	San Bernardino	SCE	26
2	Barstow			15
Total Spaces				41

Southwest Gas, in consultation with and approved by SED, prioritized 8 MHPs for conversion in calendar year 2024. These MHPs are listed in Table 3 below.

Table 3				
MHP	City	County	Overlapping Electric Utility	# of Spaces
1	South Lake Tahoe	El Dorado	Liberty	17
2	South Lake Tahoe	El Dorado	Liberty	30
3	Apple Valley	San Bernardino	SCE	35
4	Barstow	San Bernardino	SCE	47
5	Barstow	San Bernardino	SCE	95
6	Victorville	San Bernardino	SCE	20
7	Victorville	San Bernardino	SCE	35
8	Yermo	San Bernardino	SCE	84
Total Spaces				363

MHP Program Cost Accounting

Southwest Gas completed 3 additional MHP conversions through 2023, MHPs 28, 29 and 30 in Table 1 above. The supplemental program and cost data is provided as Attachment A to this Annual Report.

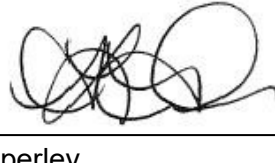
Conclusion

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

VERIFICATION

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

DATED this 1st day of February 2024.



Amy L. Timperley
Senior Vice President/Chief Regulatory Strategy
and Planning Officer

ATTACHMENT A
SOUTHWEST GAS CORPORATION (U 905 G)
MHP PROGRAM ANNUAL STATUS REPORT 9

Annual Status Report 9		Per-year costs, not cumulative									
	Descriptor	2015	2016	2017	2018	2019	2020	2021	2022	2023	
Program - Capital Costs	Costs that are inconsistent among the other IOUs, driven by utility specific business models or cost accounting practices. These costs should be separated out so that others do not compare costs that are not comparable with others.										
Project Management Costs											
	Program management office costs (Project Management, Program Management, schedulers, cost analysts and field engineers)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 19,886	\$ -	\$ -	\$ -	
Outreach											
	Property tax on capital spending not yet put into service	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,232	
	AFUDC	\$ -	\$ -	\$ 103	\$ 90	\$ 1,113	\$ 7,591	\$ 826	\$ 205	\$ 1,595	
	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.										
Other											
	Labor (Internal)***	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 57,926	
	Non-Labor	\$ -	\$ -	\$ 5,926	\$ 5,262	\$ 111,641	\$ 125,433	\$ 8,119	\$ 115,666	\$ 2,113,795	
	Utility specific overhead driven by corporate cost model	\$ -	\$ -	\$ 1,186,020	\$ 2,966,820	\$ 1,185,183	\$ 3,109,807	\$ 375,099	\$ 2,925,606	\$ 4,658,382	
Sub-Total Capital Cost To The Meter - Expense Costs		\$ -	\$ -	\$ 1,186,020	\$ 2,966,820	\$ 1,185,183	\$ 3,109,807	\$ 375,099	\$ 2,925,606	\$ 4,658,382	
Project Management Costs											
	Program startup cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
	Outreach	\$ -	\$ -	\$ 500	\$ 2,915	\$ -	\$ 34,377	\$ -	\$ -	\$ -	
Other											
	Program startup cost for supporting organizations	\$ -	\$ -	\$ -	\$ -	\$ 435	\$ 2,505	\$ -	\$ -	\$ -	
	Other Labor (Internal)***	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
	Cancelled Project Costs from MHPs that have failed to complete the MHP agreement or have cancelled the project	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,689	\$ -	\$ -	\$ -	
Sub-Total To The Meter		\$ -	\$ -	\$ 500	\$ 2,915	\$ 435	\$ 38,571	\$ -	\$ -	\$ -	

ATTACHMENT A
SOUTHWEST GAS CORPORATION (U 905 G)
MHP PROGRAM ANNUAL STATUS REPORT 9

Annual Status Report 9		Per-year costs, not cumulative											
Descriptor		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 [k]	Present Value Revenue Requirement
Beyond The Meter - Capital	Pass through cost where the MHP Owner is responsible for overseeing the vendor's work and IOU to reimburse per D.14-02-021												
Civil/Trenching	N/A												
Electric System	Labor and material for installing BTM Electric Infrastructure (e.g. Labor / Structures												
Gas System	Labor and material for installing BTM Gas Infrastructure (e.g. BTM Permits, including HCD fees												
Other	Other Labor (Internal)***												
Sub-Total Beyond The Meter		\$ -	\$ -	\$ 647,829	\$ 891,742	\$ 619,652	\$ 1,597,891	\$ 131,261	\$ 737,316	\$ 314,784	\$ 3,662,922	\$ 4,973,166	
Total TTM & BTM		\$ -	\$ -	\$ 1,834,348	\$ 3,861,477	\$ 1,805,270	\$ 4,746,269	\$ 506,361	\$ 3,662,922	\$ 314,784	\$ 3,662,922	\$ 4,973,166	
Rate Impact and Revenue Requirement													
Rate Impact		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 [k]	
Gas	Average Rate w/o MMBA recovery - Core [b]				\$ 1.11995	\$ 1.11995	\$ 1.24246	\$ 1.26456	\$ 1.69515	\$ 2.41994	\$ 1.73964	\$ 1.73964	
	Average Rate w/ MMBA recovery - Core [c]				N/A	\$ 1.12391	\$ 1.25042	\$ 1.28704	\$ 1.70807	\$ 2.45027	\$ 1.77504	\$ 1.73964	
	Rate Change - Core [d]				N/A	\$ 0.00396	\$ 0.00796	\$ 0.02249	\$ 0.01292	\$ 0.03032	\$ 0.03540	\$ -	
	% Rate Change - Core [e]				N/A	0.35%	0.64%	1.75%	0.76%	1.24%	1.99%	0.00%	
	Average Rate w/o MMBA recovery - Non-Core [f]				\$ 0.23769	\$ 0.23769	\$ 0.32156	\$ 0.33946	\$ 0.46057	\$ 0.55355	\$ 0.52680	\$ 0.52680	
	Average Rate w/ MMBA recovery - Non-Core [g]				N/A	\$ 0.24165	\$ 0.32952	\$ 0.36195	\$ 0.47349	\$ 0.58388	\$ 0.56220	\$ 0.52680	
	Rate Change - Non-Core [h]				N/A	\$ 0.00396	\$ 0.00796	\$ 0.02249	\$ 0.01292	\$ 0.03032	\$ 0.03540	\$ -	
	% Rate Change - Non-Core [i]				N/A	1.64%	2.42%	6.21%	2.73%	5.19%	6.30%	0.00%	
Electric	Average Rate w/o MMBA recovery - Total System												
	Average Rate w/ MMBA recovery - Total System												
	Rate Change - Total System												
	% Rate Change - Total System												
Revenue Requirement		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 [k]	
Gas Revenue Requirement-TTM [j]						\$ 626,380	\$ 808,596	\$ 1,317,984	\$ 1,374,148	\$ 1,812,203	\$ 2,516,305	\$ -	\$ 5,712,103
Electric Revenue Requirement-BTM [k]						\$ 231,393	\$ 324,613	\$ 519,867	\$ 537,932	\$ 721,977	\$ 734,668	\$ -	\$ 2,099,623
Electric Revenue Requirement-BTM													

Notes:

[a] Estimated on pre-conversion and post-conversion records.

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

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

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

[e] % Rate Change - Core = Rate Change - Core / Average Rate w/ MMBA recovery - Core

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

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

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

[i] % Rate Change - Non-Core = Rate Change - Non-Core / Average Rate w/ MMBA recovery - Non-Core

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

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