

LFC Requester:

Julisa Rodriguez

AGENCY BILL ANALYSIS - 2026 REGULAR SESSION

WITHIN 24 HOURS OF BILL POSTING, UPLOAD ANALYSIS TO

AgencyAnalysis.nmlegis.gov and email to billanalysis@dfa.nm.gov*(Analysis must be uploaded as a PDF)***SECTION I: GENERAL INFORMATION***{Indicate if analysis is on an original bill, amendment, substitute or a correction of a previous bill}*

Date Prepared: 02/10/2026

Check all that apply:

Bill Number: HM 54

Original Correction Amendment Substitute

Sponsor: Rep. Matthews

Short MOBILE HOME PARKS UTILITIES

Title: PRC WORKING GROUP

Agency Name
and Code430 – Public Regulation
Commission

Number:

Person Writing

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Appropriation		Recurring or Nonrecurring	Fund Affected
FY26	FY27		

REVENUE (dollars in thousands)

Estimated Revenue			Recurring or Nonrecurring	Fund Affected
FY26	FY27	FY28		

(Parenthesis () indicate revenue decreases)

ESTIMATED ADDITIONAL OPERATING BUDGET IMPACT (dollars in thousands)

	FY26	FY27	FY28	3 Year Total Cost	Recurring or Nonrecurring	Fund Affected
Total						

(Parenthesis () Indicate Expenditure Decreases)

Duplicates/Conflicts with/Companion to/Relates to:

Duplicates/Relates to Appropriation in the General Appropriation Act

SECTION III: NARRATIVE

BILL SUMMARY

Synopsis:

The memorial requests the Public Regulation Commission (PRC) to convene and lead a working group that would promote reliable and consistent utilities for New Mexico residents who are tenants of mobile home parks.

FISCAL IMPLICATIONS

The memorial may require additional funding for the New Mexico Public Regulation Commission to fulfill the request of the memorial to cover meetings, travel, etc.

SIGNIFICANT ISSUES

HM 54 highlights concerns related to utility service and habitability issues in mobile home parks; however, a significant underlying challenge is the lack of clear regulatory jurisdiction. In many cases, no single agency has comprehensive authority over the utilities serving these homes, and in some circumstances, no agency has jurisdiction at all.

Mobile home parks are frequently served by multiple utilities operating under different regulatory frameworks. For example, a single park may receive electric service from a rural electric cooperative, over which the PRC has only limited authority; natural gas service from an investor-owned utility, where PRC jurisdiction is broader but does not extend beyond the master meter; and water or wastewater service from a municipal utility, which is not subject to PRC regulation. This fragmented regulatory structure complicates oversight, accountability, and consumer protection, and may limit the effectiveness of any recommendations produced by the proposed study.

Additionally, the memorial does not specify how study group members will be selected. Additional guidance regarding appointment authority, selection criteria, or stakeholder representation could improve transparency and help ensure that the study group is balanced, informed, and capable of addressing the complex jurisdictional and regulatory issues identified in the memorial.

PERFORMANCE IMPLICATIONS

N/A

ADMINISTRATIVE IMPLICATIONS

HM 54 creates new administrative expectations for the PRC to convene a working group, coordinate stakeholders, complete analysis for recommendations, and report back to the Legislature — all of which will take staff time, coordination, and resources.

CONFLICT, DUPLICATION, COMPANIONSHIP, RELATIONSHIP

N/A

TECHNICAL ISSUES

Not all owners of mobile home parks are responsible for providing utilities. In many cases, private entities or municipalities provide utility services up to each mobile home.

OTHER SUBSTANTIVE ISSUES

While HM 54 calls for the creation of a study group, the composition of that group may not fully reflect all relevant perspectives. Given the role of municipal utilities in serving mobile home parks and the absence of state regulatory oversight for those entities, inclusion of a representative from a municipal utility would strengthen the study's analysis. Similarly, because many residents of mobile home parks are low-income, representation from a low-income or very low-income advocacy organization would help ensure that the study considers affordability, equity, and consumer protection impacts.

ALTERNATIVES

N/A

WHAT WILL BE THE CONSEQUENCES OF NOT ENACTING THIS BILL

Status quo.

AMENDMENTS

N/A