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FISCAL IMPACT REPORT

BILL NUMBER: House Memorial 54

SHORT TITLE: Mobile Home Parks Utilities PRC Working Group

SPONSOR: Matthews

LAST ORIGINAL
UPDATE: _____ **DATE:** 2/10/2026 **ANALYST:** Francis

ESTIMATED ADDITIONAL OPERATING BUDGET IMPACT*

(dollars in thousands)

Agency/Program	FY26	FY27	FY28	3 Year Total Cost	Recurring or Nonrecurring	Fund Affected
PRC		Indeterminate but minimal			Nonrecurring	General Fund

Parentheses () indicate expenditure decreases.

*Amounts reflect most recent analysis of this legislation.

Sources of Information

LFC Files

Agency or Agencies Providing Analysis

Public Regulation Commission

Agency or Agencies That Were Asked for Analysis but did not Respond

Regulation and Licensing Department

Attorney General

SUMMARY

Synopsis of House Memorial 54

House Memorial 54 (HM54) requests the Public Regulation Commission (PRC) to convene a working group to develop recommendations for regulating access to utilities for mobile home park tenants.

The working group would be composed of the following stakeholders:

- PRC
- Regulation and Licensing Division (RLD)
- Attorney General
- Mobile home park owners association
- Municipal utility
- Low-income person advocacy group

The working group is asked to report its findings and recommendations by November 1, 2026.

FISCAL IMPLICATIONS

Memorials do not contain appropriations and are not enforceable as state law. The working group requested in this memorial is outside of the normal operations of the PRC involved and is likely to result in additional costs for the other members of the working group, although these costs are likely to be minimal.

SIGNIFICANT ISSUES

HM54 identifies several issues related to mobile home tenants access to utilities, including interruptions, lack of appropriate remedies, and disparate regulations. According to *Manufactured Home News*, New Mexico is third in the country for the highest percent of housing units that are manufactured homes (including both manufactured housing and mobile housing) at 16.6 percent, or roughly 1-in-6 as noted in HM54.¹

PRC reports that one of the serious challenges is “the lack of clear regulatory jurisdiction” for the mobile home parks:

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 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.

PERFORMANCE IMPLICATIONS

PRC expresses concern about how members should be appointed or selected and states additional guidance and criteria would be helpful to get the right group of stakeholders. The agency also indicates the proposed stakeholders in HM54 may not be broad enough:

While HM54 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.

NF/hg/sgs

¹ [Manufactured Homes | National Manufactured Home Locations According to State Statistics](#)