



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

FILED
10-28-15
04:59 PM

Application of Pacific Gas and Electric Company
for Authority, Among Other things, to Increase
Rates and Charges for Electric and Gas Service
Effective on January 1, 2017.

A. 15-09-001
(filed September 1,
2015)

MOTION FOR PARTY STATUS
OF THE
WESTERN MANUFACTURED HOUSING COMMUNITIES ASSOCIATION

Edward G. Poole
Anderson & Poole
601 California Street, Suite 1300
San Francisco, CA 94108
(415) 956-6413 – Telephone
(415) 956-6416 – Facsimile
epoole@adplaw.com

October 28, 2015

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority, Among Other things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2007.	A. 15-09-001 (filed September 1, 2015)
--	---

MOTION FOR PARTY STATUS
OF THE
WESTERN MANUFACTURED HOUSING COMMUNITIES ASSOCIATION

I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California ("Commission"), the Western Manufactured Housing Communities Association ("WMA") respectfully moves for party status in the above-captioned proceeding, and states as follows:

II. DISCUSSION

The Western Manufactured Housing Communities Association (WMA) represents the owners of 1,654 manufactured housing communities, which contain

181,389 homes, distributed throughout California. In total statewide, there are 4,707 mobile home communities, with 365,382 homes.¹ These communities provide Californians the opportunity to own their home at low cost compared to traditional foundation-constructed housing, and the flexibility to move their homes around the state. Manufactured housing, or “mobile homes,” fill an important position in the range of housing options available to California.

The majority of these communities in the State of California are “master metered”—about 83% within the service territories of the four largest utilities, according to utilities’ filings. Utility service, such as electricity and natural gas, is delivered to a single meter at the community, and the service is then delivered to end-users at the individual mobile home spaces through a private distribution system, which is most often separately “submetered.”

California Public Utilities Code Section (hereinafter “Section” or “§”) 739.5(a)² requires that submetered community residents pay for electric and natural gas service at the “applicable” rate charged by the investor-owned utility which would have otherwise served those residents. This statute also requires that the Commission establish a master-meter rate that includes a “sufficient differential to cover the reasonable average costs to master meter customers of providing submetered service.” Commission decisions have established the principle that this “differential” is the exclusive method of recovering such costs as fall under the defined submeter system.³

¹ California Housing and Community Development, October 2008.

² All code references are to the Public Utilities Code unless otherwise noted.

³D.95-02-090, 58 CPUC 2d at 720, Conclusion of Law 3 and Order 1, as modified by D.95-08-056, 61 CPUC 2d at 232, Order 1, D.01-08-040, p. 29, Conclusion of Law 2, as modified in D.02-01-043, pp. 7-8, and D.04-11-033.

As a result, the community owners must rely entirely on the due consideration of the Commission to maintain the viability of their private energy utility systems.

II. INTEREST IN THIS PROCEEDING

WMA generally supports the proposed master-meter discount contained in PG&E's testimony. However, without seeing testimony of other parties, WMA needs to be an active party in this proceeding to determine if a settlement or reply testimony might be necessary.

III. SERVICE

For purposes of receipt of all correspondence, pleadings, orders and notices in this proceeding, the following WMA representative should be placed on the service list under the "party" designation:

Edward G. Poole
Anderson & Poole
601 California Street, Suite 1300
San Francisco, CA 94108-2818
(415) 956-6413 – Telephone
(415) 956-6416 – Facsimile
epoole@adplaw.com
Counsel for the Western Manufactured Housing
Communities Association

In addition, WMA requests that the following WMA representative be placed on the service list under the "information only" designation

Richard McCann, Ph.D.
MCubed

³The term **master-meter discount** and **submeter discount** is used here in analogous fashion to "unit discount", "space discount," or "master-meter differential" specified by other utilities and discussed in Section 739.5.

2655 Portage Bay, Suite 3
Davis, CA 95616
(530) 757-6363 – Telephone
rmccann@umich.edu

IV. CONCLUSION

For the above reasons, the WMA respectfully requests that the Commission grant its Motion for Party Status.

Dated: October 28, 2015

Respectfully submitted,

/s/
Edward G. Poole
Anderson & Poole
601 California Street, Suite 1300
San Francisco, CA 94108-2818
(415) 956-6413 – Telephone
(415) 956-6416 – Facsimile
epoole@adplaw.com

Counsel for the Western Manufactured
Housing Communities Association