



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

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Order Instituting Rulemaking into Transfer of
Master-Meter/Submeter Systems at Mobilehome
Parks and Manufactured Housing Communities to
Electric and Gas Corporations.

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PUBLIC UTILITIES COMMISSION
FEBRUARY 24, 2011
SAN FRANCISCO OFFICE
RULEMAKING 11-02-018

**COMMENTS OF THE UTILITY REFORM NETWORK ON ORDER
INSTITUTING RULEMAKING INTO ISSUES CONCERNING TRANSFER OF
MASTER-METER/SUBMETER SYSTEMS AT MOBILEHOME PARKS AND
MANUFACTURED HOUSING COMMUNITIES TO ELECTRIC AND GAS
CORPORATIONS**

April 8, 2011

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COMMENTS OF THE UTILITY REFORM NETWORK ON ORDER INSTITUTING RULEMAKING INTO ISSUES CONCERNING TRANSFER OF MASTER-METER/SUBMETER SYSTEMS AT MOBILEHOME PARKS AND MANUFACTURED HOUSING COMMUNITIES TO ELECTRIC AND GAS CORPORATIONS

I. INTRODUCTION

On August 20, 2010, the Western Manufactured Housing Community Association (WMA) filed the Petition 10-08-016 to Adopt, Amend, or Repeal a Regulation Pursuant to California Public Utilities Code § 1708.5. In response to comments and a workshop, on February 24, 2011 the Commission issued the Decision Granting Petition in Part and Instituting Rulemaking Into Issues Concerning Transfer of Electric and Natural Gas Meter-Metered Service at Mobilehome Parks and Manufactured Housing Communities to Direct Service by Electric and/or Natural Gas Corporations (“OIR” or “Rulemaking”). The Utility Reform Network (“TURN”) hereby submits these comments pursuant to Rule 6.2 of the Commission’s Rules of Practice and Procedure and the Commission’s directives in Rulemaking 11-02-018.

II. COMMENTS

A. Scope and Schedule of OIR

The OIR list nine issues that parties identified as objectives for the rulemaking and indicated that this rulemaking has been open to further the dialogue between parties to define the problems and solutions surrounding the transfer of mobilehome park (“MHP”) to direct utility service.¹

- Ensuring safety of utility service at MHPs, or safety and reliability.
- Establishing a means/method for prioritization of transfers from MHP submeter systems to direct service, including clarity of scope – must transfers be voluntary or can/should the Commission move toward the complete elimination of MHP submeter systems?
- Ensuring reasonableness/equity in cost allocation associated with transfers, including the impact on all ratepayers, whether MHP tenants or not.
- Improving the ease and speed of transfers and reducing their cost.

¹ Decision Granting Petition in Part and Instituting Rulemaking Into Issues Concerning Transfer of Electric and Natural Gas Master-Metered Service at Mobilehome Parks and Manufactured Housing Communities to Direct Service by Electric and/or Natural Gas Corporations (henceforth “OIR”), pp. 14-15.

- Better utilization of existing line extension rules (Rules 15 and 16 in each utility's filed tariffs).
- Recognizing and apportioning risks/liabilities during construction/transfer.
- Considering the impact of an increase in transfers on the financial resources available for and timing of other utility endeavors.
- Ensuring seamless continuation of service to MHP tenants (no interruptions as transfers are implemented).
- Ensuring consistency with previous Commission decisions.

The OIR stated that the Commission would address these issues by initially setting the scope of this Rulemaking broadly to answer the general question, "What can and should the Commission do to encourage the replacement of MHP submeter systems with direct utility service on a reasonable basis and in a manner both timely and fair to all concerned?" TURN agrees with and appreciates the broad scope of this proceeding as it will help to ensure that all the various party concerns will be addressed. TURN does not have any suggested modifications to this preliminary scope. TURN, however, suggests that the question of whether the transfers should be voluntary or not may be better to address early in the course of the proceeding as the answer may have an impact on the scope of the data gathering effort required. If nothing else, it may help parties to get a better handle on how much data must be gathered if parties could discuss early on how many MHPs are likely to voluntarily request to transfer their master-metered service to direct utility service as compared to the total number of MHPs with master-metered service.

B. Data gathering requirements

The OIR specifically requests parties to provide comments that include a list of necessary facts and a plan or proposal for development of that factual information.² TURN provides the following recommendations under the assumption that it will be beneficial for this rulemaking and any future decisions regarding the transfer of master-metered service to direct utility service to have a single database of information on all master-metered MHPs in California. As stated above, the scope of the data gathering

² OIR, p. 18.

effort may change if the Commission decides only to focus on voluntary transfers of service at this time.

1. Single database on master-metered MHPs

TURN recommends that the Commission develop a single database containing information on all master-metered MHPs under its jurisdiction. Presumably the utilities have information on all the MHPs receiving master-metered service in its service territory so the Commission should first obtain that information from the utilities, including service address, billing address, type of service (gas or electric), number of spaces, and any other relevant data that the utilities may have collected about the particular MHP. Given that the information may have changed over the years, the information should be checked against information kept by the California Department of Housing and Community Development (“HCD”) and the Commission’s records on MHPs (CPSD or USRB inspection data) to look for discrepancies.

2. Data on master-metered MHP utility systems

TURN recommends that the Commission obtain data about each master-metered MHPs utility system. TURN suggests that one possible method would be to send a questionnaire to each MHP that requests information, such as date of installation, whether the service is overhead or underground, date and location of any facility replacements, and capacity of the system. TURN recommends that the utilities be involved in the creation of any such questionnaire.

3. Identification of unsafe or unreliable MHP systems to prioritize transfers

TURN recommends that the Commission obtain data to identify MHPs with a history of unsafe or inadequate utility systems in order to help prioritize transfers. Such identification can be made on the basis of number of recent citations, fines or complaints. TURN suggests that the Commission obtain input from MHP resident associations (such as Golden State Manufactured-Home Owners League); the Commission’s Consumer Affairs Branch, which accepts complaints from submetered MHP residents; the Commission’s Utilities Safety and Reliability Branch (USRB), which enforces Federal Pipeline Safety Regulations through audits of jurisdictional MHP systems; and other state agencies with jurisdiction over aspects of MHP master meter utility service, including the

California Department of Housing and Community Development and the California Department of Consumer Affairs, Division of Weights and Measures. Using this information, parties and the Commission could create a list of poor performing or unsafe MHPs that should be given priority to transfer service.

4. Current processes and costs for transferring service

Finally, TURN recommends that the Commission compile information on the current utility procedure for transferring master-metered service to direct utility service as well as the costs to transfer service. The utilities should provide a description of the process used to transfer service as well as provide the following information on each MHP that has transferred its master-metered service to direct utility service:

- Type of system (gas or electric),
- If electric, MHP whether overhead or underground,
- Layout of the system,
- Service level and delivered amperage.
- Age of submeter system at time of transfer,
- Number of spaces,
- Initial cost estimates to transfer system,
- Final recorded costs of transfer,
- Initial estimate of the condition of the submeter system,
- Final estimate of the condition of the system as agreed to by MHP owner and utility,
- List of all work that had to be done and the costs for these activities.
- Value of the system paid to the park

April 8, 2011

Respectfully submitted,

_____/s/
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CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On April 8, 2011, I served the attached:

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RULEMAKING INTO ISSUES CONCERNING TRANSFER OF MASTER-
METER/SUBMETER SYSTEMS AT MOBILEHOME PARKS AND MANUFACTURED
HOUSING COMMUNITIES TO ELECTRIC AND GAS CORPORATIONS**

on all eligible parties on the attached list **R.11-02-018** by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this April 8, 2011, at San Francisco, California.

 /S/
Larry Wong

Service List for R.11-02-018

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