



**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.

Rulemaking 11-02-018

**COMMENTS OF THE COALITION OF CALIFORNIA UTILITY  
EMPLOYEES ON THE COMMISSION'S RULEMAKING 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**

April 8, 2011

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Utility Employees

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Pursuant to the Commission's February 24, 2011 Order Instituting Rulemaking 11-02-018, the Coalition of California Utility Employees (CUE) offers these comments on the Commission's Rulemaking to examine what the Commission should do to advance the 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.

CUE appreciates the opportunity to submit comments on this Rulemaking. CUE's member unions represent employees of most electric and gas utilities in California. Thus, CUE is keenly aware that many mobilehome park and manufactured housing communities have electric and gas systems that are not constructed or maintained to adequately provide safe and reliable service. CUE is also aware that, despite the State's policy to transfer the electric and gas systems in mobilehome parks from the park owner to the utility (with which CUE

wholeheartedly agrees), very few systems have been transferred because of the dispute regarding the standards to which the park owner is required to bring the system prior to transfer. CUE has no doubt that the failure to transfer these aging systems from the master-meter/submeter systems to direct utility service adds to the safety and reliability problems that plague many of the gas and electric utility systems in California.

CUE's priority is ensuring safe electric and gas systems for utility employees, and safe and reliable service for the public. Thus, CUE wholly supports the Commission's endeavor here and looks forward to working collaboratively to fix this problem.

CUE believes that the facts necessary to create a plan to solve this problem include:

- (1) The approximate number of mobilehome parks that run on a master-meter/submeter system;
- (2) The general status of the mobilehome park electric distribution systems that run on a master-meter/submeter system in relation to the requirements of G.O.95, Overhead Electric Line Construction;
- (3) The general status of the mobilehome park electric distribution systems that run on a master-meter/submeter system in relation to the requirements of G.O.128, Construction of Underground Electric Supply and Communication Systems;
- (4) The general status of the mobilehome park gas distribution systems that run on a master-meter/submeter system in relation to the

requirements of G.O.112, Design, Construction, Testing, Maintenance and Operation of Utility Gas Gathering, Transmission and Distribution Piping Systems; and

- (5) The general status of the mobilehome park gas distribution systems that run on a master-meter/submeter system in relation to the requirements of G.O.58, Standards of Gas Service.

These facts could be obtained from a combination of sources, including: Western Manufactured Housing Communities Association; mobilehome park resident associations, such as Golden State Manufactured Home Owners League, Inc.; the Commission's Consumer Affairs Branch, which accepts complaints from submetered mobilehome park residents; the Commission's Utility Safety and Reliability Branch, which enforces Federal Pipeline Safety Regulations through audits of mobilehome park systems; the California Department of Housing and Community Development (HCD), which performs inspections of mobilehome park electric and gas submeter systems; cities and counties where the mobilehome parks are located which have been delegated inspection authority by HCD; and the utilities, which maintain records of master-meter accounts.

CUE also requests to be placed on the service list for this Rulemaking as

follows:

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Dated: April 8, 2011

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing

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to be served upon all parties to Rulemaking 11-02-018 via email, mail or messenger pursuant to the Commission's Rules of Practice and Procedure.

Dated at South San Francisco, California, this 8th day of April, 2011.

*/s/*

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Valerie Stevenson

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