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

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  
(Filed February 24, 2011)

**ADMINISTRATIVE LAW JUDGE'S RULING REGARDING  
3<sup>RD</sup> PREHEARING CONFERENCE**

**1. Summary**

Attached to this ruling is a preliminary report that summarizes, without revealing any customer-specific information, the responses to the questionnaire mailed in June 2011 to owners/operators of master metered manufactured housing and mobilehome parks (MHPs) served by the electric and/or gas utilities subject to this rulemaking. The report and the proposed, revised schedule included in this ruling will be the subject of discussion at the 3<sup>rd</sup> prehearing conference (PHC) previously set for August 19, 2011 at the San Francisco offices of the California Public Utilities Commission (CPUC).

## 2. Discussion

### 2.1. Report on Responses to MHP Questionnaire

The report attached to this ruling summarizes the approximately 680<sup>1</sup> responses to the MHP questionnaire which CPUC-jurisdictional electric and/or gas utilities mailed to their identified MHP master-meter customers. Most of the responses were mailed directly to me; a few were submitted to a utility, which then forwarded the response to me. Under my direction, an intern in the CPUC's Administrative Law Judge (ALJ) Division entered the data into an ACCESS database developed by an ALJ Division internet technology (IT) liaison, alphabetized the responses, and placed them in binders.<sup>2</sup> Also under my direction, the IT liaison prepared the draft report attached to this ruling. The report does not reveal any customer-specific information.

The MHP questionnaire was developed as a relatively low-cost means of obtaining "essential, basic information about the size and condition of MHPs identified (e.g., number of spaces, age, the electric and/or gas load and corresponding operational metrics [effective amperage, gas pressures, etc.], information about maintenance, repairs, replacement, and emergency response activities over time) ..."<sup>3</sup>

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<sup>1</sup> This total does not include 20 responses received from entities which we concluded were not MHPs, either because the person responding stated that the entity was an apartment complex or R.V. Park (and in some instances, that conversion of a former MHP had occurred), or because the entity's name includes the words "R.V. Park." This total also excludes two responses consisting only of the last page of the questionnaire (questions 18-20), without any other identifying information. Duplicates have been removed to the extent duplication was clearly established.

<sup>2</sup> A demonstration of the database and related data entry form occurred in conjunction with the 2<sup>nd</sup> PHC on June 14, 2011.

<sup>3</sup> *Assigned Commissioner's Ruling and Scoping Memo*, May 11, 2011, at 4.

At the 3<sup>rd</sup> PHC, parties should be prepared to discuss whether this fact-finding effort provides a sufficient basis for moving forward to the development of party proposals as well as any specific suggestions for making the draft report more useful.

**2.2. Proposed Revised Schedule**

The schedule below reflects the last formal events held in this rulemaking (on June 14, 2011) prior to the 3<sup>rd</sup> PHC set for August 19. All dates subsequent to August 19 are proposals, only, and subject to discussion at the PHC. Consistent with the scoping memo’s directive, these revisions contemplate resolution of this rulemaking well within 18-months of May 11, 2011.

June 14, 2011, 9:00 a.m., Commission Courthouse, San Francisco	2 <sup>nd</sup> PHC.
June 14, 2011, 10:00 a.m., Commission Courtroom, San Francisco	Workshop on existing standards and safety practices relevant to electric and natural gas service at MHPs.
August 19, 2011, 10:00 a.m., Commission Courtroom San Francisco	3 <sup>rd</sup> PHC. Commission Courtroom State Office Building 505 Van Ness Avenue San Francisco, CA 94102
???still needed ???	<i>Workshop on results of MHP questionnaire and related issues</i>
October 6, 2011	Parties file proposals.
October 21, 2011	Workshop to discuss party proposals, to assess areas of potential agreement, and/or seek support for creative solutions.
November 18, 2011	Parties file responses to proposals of other parties.
December 6, 2011	4 <sup>th</sup> PHC to discuss need for workshops (or other procedures). State Office Building

