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

<b>Application of Pacific Gas &amp; Electric Company to Revise its Electric Marginal Costs, Revenue Allocation and Rate Design (U39M).</b>	<b>A. 16-06-013</b>
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**MOTION FOR PARTY STATUS OF THE  
WESTERN MANUFACTURED HOUSING COMMUNITIES ASSOCIATION**

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**August 11, 2016**

Pursuant to Rule 1.4(a)(4), the Western Manufactured Housing Community Association (WMA) hereby requests to become a party to this proceedings which is considering the Application of Pacific Gas & Electric Company to Revise its Electric Marginal Costs, Revenue Allocation and Rate Design. Rule 1.4(a)(4) requires an entity seeking party status to “state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.” As shown below, WMA is interested in, and potentially impacted by the current proceeding if the proposed master meter discount, explained in more detail below, is adopted as proposed by the applicant.

The extent of WMA’s involvement will be to participate in any settlement discussions, serve direct and/or rebuttal testimony, and cross-examine witnesses during evidentiary hearings, as may be relevant and applicable, regarding the master meter discount. WMA’s participation will not expand the scope of this proceeding and no party would be prejudiced by the granting of this motion for party status at this stage, before a Scoping Memo has been issued.

## **1. Background**

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.<sup>1</sup> These communities provide Californians the opportunity to own their

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<sup>1</sup> California Housing and Community Development, October 2008.

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.”<sup>2</sup>

California Public Utilities Code Section (hereinafter “Section” or “§”) 739.5(a)<sup>3</sup> 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.<sup>4</sup> As a

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<sup>2</sup> The 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.

<sup>3</sup> All code references are to the Public Utilities Code unless otherwise noted.

<sup>4</sup>D.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.

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

## **2. Basis of Appearance**

WMA has been involved, either actively or as a settlement party in most of the past PG&E GRC Phase II proceedings in the last 20 years. Most recently, WMA participated in a settlement that proposed a discount of \$0.18004 per space/per day, which was adopted by the Commission in Decision 15-08-005. The discount proposed by PG&E in this proceeding lowers the discount, quite dramatically, to \$0.04892 per space/per day.

From what WMA can determine, this lowering is through a reduction in the base discount of 40%, which is contradictory to PG&E's claim in this proceeding that it is making no adjustments to the underlying costs in rates. WMA is in the process of obtaining the underlying workpapers to determine the reasons for such a drastic change from the last general rate case. WMA will note, however, that the Diversity Benefit Adjustment appears to be reduced.

WMA also intends to explore the separate study on fixed costs for residential customers in which PG&E claims have increased a substantial amount. WMA intends to be closely involved in this to determine how much of the MHP costs are tied to PG&E's fixed costs.

## **3. Service of Process**

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

