



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

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Patterson Point LP,

Complainant,

vs.

Southern California Edison Company (U 338-E)

Defendant.

C.25-06-014

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) CASE STATUS UPDATE**

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**I.**

**INTRODUCTION**

Pursuant to direction received from Assistant Chief Administrative Law Judge (ALJ) Colbert and ALJ Goldberg during the November 21, 2025, Status Conference, Southern California Edison Company (SCE) files this case status update. As discussed herein, pursuant to direction received during the Status Conference, SCE agrees to adjust its definition of properties eligible for a single meter to include Patterson Point and future projects that are similarly situated. SCE was directed to choose whether it would either (1) agree to a single meter for Patterson Point so that the proceeding could be dismissed or (2) go forward with the proceeding without further written testimony or briefing, resulting in a Presiding Officer’s Decision (POD) that grants Patterson Point’s request for a single meter.<sup>1</sup> SCE chooses to continue with the

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<sup>1</sup> See, November 21, 2025, Status Conference Reporter’s Transcript (Status Conference Transcript) at pp. 23-24, 27-29.

proceeding so that the Commission has an opportunity to provide confirmation in the POD that SCE's adjusted approach is consistent with statutory and tariff rule provisions and to provide direction that this adjusted approach only applies to future projects that are similarly situated to Patterson Point.

## II.

### **BACKGROUND**

On or about February 2024, the Housing Authority of County of Santa Barbara (HASBARCO) submitted a request to SCE for 24 individual meters for Patterson Point.<sup>2</sup> On or about August 2024, it was communicated to SCE that HASBARCO was interested in pursuing a single meter configuration.<sup>3</sup> In June 2025, SCE received a communication that HASBARCO was transitioning to a multi-meter setup.<sup>4</sup>

On June 11, 2025, Patterson Point LP filed its Complaint requesting a single meter instead of a multiple meter configuration for the Patterson Point Project. SCE filed its Answer on July 31, 2025. On August 14, 2025, ALJ Goldberg issued an email ruling granting Patterson Point LP's motion for an extension of time to file the joint prehearing statement. On August 15, 2025, Patterson Point and SCE filed its joint prehearing conference statement. On August 15, 2025, Patterson Point filed a notice of counsel. On August 25, 2025, a prehearing conference was

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<sup>2</sup> As part of that submission, SCE received a preliminary electrical drawing for Patterson Point by Prefab Logic MEP, consultant for HASBARCO, dated January 24, 2024, which contains a single line drawing of the meter module installation requested that shows 24 individual meters for the units.

<sup>3</sup> On August 2, 2024, SCE's Field Planning Technician emailed Windward Design Services (consultant for Patterson Point), requesting confirmation regarding how many meters Patterson Point is requesting, "Based on the files you had sent me I am counting ...24 -100A Meters for 24 Residential Units, 1- 225A Meter for EV Chargers [and] 1-600 A Meter for House Panel 1&2, Elevator, Water Heater 1&2, and Swing Tank."

Windward Design replied on August 9, 2024, "I have [been] working on getting an updated single line diagram. They have made changes, one being they are not going with individual meters for the 24 units. I'm hopeful I can get the information back to you as soon as possible so you can wrap up your Working Drawings."

<sup>4</sup> On June 2, 2025, a HASBARCO consultant emailed SCE's Field Planning Technician, "The Housing Authority is transitioning to a multi-meter setup for this project...."

held. On September 29, 2025, an assigned Commissioner's scoping memo and ruling was issued. On November 3, 2025, SCE filed a motion to dismiss the complaint. On November 7, 2025, ALJ Goldberg issued an email ruling directing Complainant to explain its failure to submit testimony by November 14, 2025, and advising the Complainant may make a formal motion to amend the proceeding schedule. On November 12, 2025, ALJ Goldberg issued an email ruling notice of status conference on November 21, 2025. On November 14, 2025, Patterson Point filed a motion to amend the proceeding schedule. On November 18, 2025, Patterson Point filed a response to SCE's motion to dismiss. On November 18, 2025, SCE requested permission to reply to Patterson Point's response to SCE's motion to dismiss. On November 19, 2025, SCE filed a response to the motion to amend the proceeding schedule. Also on November 19, 2025, ALJ Goldberg granted SCE permission to reply to Patterson Point's response to SCE's MTD. On November 21, 2025, a status conference was held, denying the motion to dismiss, accepting Patterson Point's complaint, and directing SCE to file a response whether it would agree to grant Patterson Point's request for a single meter resulting in the dismissal of the complaint or whether it would choose to go forward with the proceeding without any further written testimony or briefing, a truncated evidentiary hearing with direct evidence only, resulting in a POD.<sup>5</sup>

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<sup>5</sup> See, Status Conference Transcript at pp. 23-24, 27-29.

### III. DISCUSSION

#### A. REQUEST FOR COMMISSION DIRECTION REGARDING FUTURE REQUESTS BY PROJECTS THAT ARE SUBSTANTIALLY SIMILAR TO PATTERSON POINT

1. Based on Commission direction provided at the November 21, 2025, status conference, SCE will expand its definition of commercial properties for metering purposes to extend to Patterson Point, and, going forward, similarly situated projects; as such, SCE requests to continue with the proceeding to receive confirmation from the Commission in the POD that neither Public Utilities Code § 780.5- which requires individual metering for residential, multi-unit, apartment-like properties- nor SCE's Tariff Rule 16 requiring individual metering for residential units, would be applicable.

SCE's position in its Answer was based on SCE's interpretation that the Patterson Point Project was more like a residential multi-unit structure, subject to Public Utilities Code §780.5<sup>6</sup> and SCE's Tariff Rule 16 (B)(3)(a),<sup>7</sup> than a commercial project, such as an assisted living facility, which is eligible for a single meter under Tariff Rule 16(B)(2).<sup>8</sup>

As a result of the Commission's direction during the November 21, 2025, status conference, SCE will adjust and expand its current interpretation of commercial projects, on a prospective basis, to include Patterson Point and similarly situated new construction projects (see

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<sup>6</sup> Public Utilities Code § 780.5: The commission shall require every residential unit in an apartment house or similar multiunit residential structure, condominium, and mobilehome park for which a building permit has been obtained on or after July 1, 1982, other than a dormitory or other housing accommodation provided by any postsecondary educational institution for its students or employees and other than farmworker housing, to be individually metered for electrical and gas service, except that separate metering for gas service is not required for residential units which are not equipped with gas appliances requiring venting or are equipped with only vented decorative appliances or which receive the majority of energy used for water or space heating from a solar energy system or through cogeneration technology.

<sup>7</sup> Tariff Rule 16(B)(3)(a): Residential. For revenue billing, electric service shall be individually metered to every residential unit in a residential building or group of buildings or other development with multiple tenants such as, but not limited to, apartment buildings, mobile home parks, etc., except as may be specified in Rule 18 and applicable rate schedules.

<sup>8</sup> See, SCE Answer at pp. 1-5.

section III(A)(2)), such that those types of projects would be considered as eligible for a single meter and would therefore be consistent with statutory and tariff provisions. In other words, because projects such as Patterson Point will now be considered commercial structures going forward under Tariff Rule 16, similar to assisted living facilities, Public Utilities Code § 780.5 would not apply, as this type of project, which is deed restricted and provides services, utilities, etc., to homeless individuals with qualifying incomes, would not be considered a residential multiunit structure that would be similar to an apartment house.<sup>9</sup> Similarly, SCE's Rule 16 requirements for individual metering of residential structures would not apply to this specific type of project going forward.

SCE's understanding from the Commission's direction is that the intent would be for SCE's expanded interpretation to be narrowly applied.<sup>10</sup> For example, projects *dissimilar* to Patterson Point, such as a developer building a new multi-unit structure and including utilities in the rental agreement for all tenants, or other potential scenarios for applicants to misapply this clarification, would *not* be eligible for a single meter. SCE believes situations such as those would be an attempted end-run around, and thus a violation of, the Public Utilities Code § 780.5 statutory requirement to individually meter residential multi-unit structures similar to apartment buildings, as well as a violation of Rule 16 individual metering requirements.

The Commission's policy behind individual metering was to encourage conservation, as well as the ability for customers to participate in various programs, including Income Qualified Programs. For example, individual metering allows individual tenants access to Income Qualified Programs and discounts, such as California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA), as well as other low-income programs, such as Solar on Multifamily Affordable Housing (SOMAH) and Multifamily Affordable Solar Housing (MASH). Individual metering provides energy price signals akin to participation in demand

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<sup>9</sup> See, Public Utilities Code § 780.5.

<sup>10</sup> See, Status Conference Transcript at pp. 19-20.

response programs and helps residents conserve electricity by promoting awareness of and responsibility for individual use. In this situation, it is SCE's understanding that the Commission's direction is an indication that since Patterson Point will pay all utilities for its special needs and formerly unhoused tenants for the term of the tenant's lease and property's deed restriction, those programs and policy considerations do not take precedence in this limited situation.

For these reasons, SCE requests to move forward with the proceeding to receive clarification in the POD regarding the applicability of the Commission's direction so that SCE can consistently, and correctly, apply it to future, eligible projects, consistent with statutory and tariff provisions.

2. SCE requests the Commission provide clarification in the POD to ensure this expanded interpretation may only be utilized for new construction projects similar to Patterson Point.

The direction to allow Patterson Point to install a single meter for this Project was based on the Commission's Environmental and Social Justice (ESJ) Action Plan, and specifically the following rationale:

1. The facility aligns with the Commission's ESJ directives under the ESJ Action Plan;
2. The facility aligns with the state's public policy to address the homeless problem in California;
3. This case raises equity issues that would be addressed by ruling in favor of Patterson Point, and
4. This ruling would have no impact or cost shift to other ratepayers. <sup>11</sup>

Per Patterson Point's response to SCE's Data Request 01, the Patterson Point Project for special needs and homeless individuals has many unique characteristics:

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<sup>11</sup> Status Conference Transcript at pp. 19-20.

- Patterson Point LP will be listed as the customer of record, i.e., none of the tenants will be customers of SCE.
- The required income level is between 30%-50% of the Area Median Income (AMI) for Santa Barbara County.
- HASBARCO staff is responsible for reviewing and approving income level eligibility applications on an annual basis.
- Rent subsidies are provided:
  - HASBARCO provides Project-Based Voucher (PBV) Assistance- tenants typically pay 30% of their adjusted monthly income towards rent, and the PBV subsidy covers the difference up to the contract rent for a duration of 20 years per Housing Assistance Payment contract under Housing and Urban Development (HUD) rules.
  - Patterson Point Rental Assistance Fund
    - Thompson Housing, LLC provides \$400,000 to supplement rents for 11 No Place Like Home (NPLH) tenants, designed to last 20 years.
- Patterson Point is directly associated with the Coordinated Entry System (CES) for tenant referrals, particularly for units funded under the NPLH program.
  - HASBARCO receives and screens referrals from the County of Santa Barbara through CES for the NPLH-designated units; CES prioritizes individuals who are chronically homeless or at risk of chronic homelessness and have mental health challenges.
- Tenants will not be responsible for any utility allowance overage because the owner pays all utilities, including electricity, water, sewer, and trash services directly.
- There is a 55-year deed restriction on the property; the financing agreement requires that the funding for the project “in combination with other financing and

assistance must not be more than what is necessary to provide quality affordable housing that is financially viable throughout the Project's 55-year state period of affordability and will not provide a profit or return on the owner's or developer's investment that exceeds permitted developer fee for that Project pursuant to Department requirements."

- Provides support services, such as assisting tenants to access Medi-Cal and other benefits, case management services, peer support activities, potential advocacy for mental health services, primary care help and advocacy, benefits counseling and advocacy, basic housing retention skills, services for persons with co-occurring disabilities/disorders, recreation and social activities, educational services, employment services, and help obtaining access to other needed services.

SCE requests that the POD clarify that in order for future projects to be eligible for a single meter, those projects must have criteria similar to Patterson Point, consistent with the Commission's ESJ Action Plan, such as, but not limited to the following:

- Constructed for homeless or special needs tenants,
- Subject to a deed restriction, and if in the future, the project converts to a market-rate rental property, or any other ineligible use, the basis for a single meter would no longer apply and individual meters would be required,<sup>12</sup>
- Owner pays all utilities for tenants,
- Provides services to assist tenants, and
- Tenants must meet certain income verification and rent subsidy requirements.

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<sup>12</sup> This condition would help ensure that developers gaining any upfront benefits such as tax incentives or subsidies would not also be benefitting at a later date from higher rental income or property values.

**B. Clarification Requested Regarding the Patterson Point Current Meter Installation Status and Certificate of Occupancy**

On page 12 of the Status Conference Transcript, Patterson Point indicates that the individual meters are not installed. On pages 16-19 of the November 21, 2025, Status Conference Transcript, there is a discussion regarding the installation status of the meters for Patterson Point. It is noted that the project has been delayed beyond the December 15, 2025, estimated completion date, to January 15, 2026, due to construction delays.<sup>13</sup> Patterson Point also indicates that if the Commission approves a single meter it would not allow Patterson Point to get its Certificate of Occupancy by December 15, 2025, which was already delayed due to construction delays, but it would go a long way to ensure Patterson Point receives the Certificate of Occupancy by January 15, 2026.<sup>14</sup> The original completion date was December 15, 2025, and, per Patterson Point, the design included individual metering, not a single meter. As such, there was not a threat to the completion date due to the individual metering or the installation of such meters. However, changing the metering configuration at this point in time could impact the January completion date. Finalizing and constructing a metering configuration includes many steps, such as: ordering switchgear (which is different for single metering versus individual metering and can require several weeks to receive), specific construction plans for the meter configuration (which differ for the different metering configurations), and having final configurations reviewed and approved as needed by the appropriate planning departments, such as SCE's planning organization and any applicable city or county approvals. As such, clarification is needed regarding the timing of the Certificate of Occupancy and impacts of changing metering configuration at this time.

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<sup>13</sup> Status Conference Transcript at pp. 16-19.

<sup>14</sup> *Id.* at pp. 18-19.

V.

**CONCLUSION**

Based on Commission direction as discussed herein, SCE will adjust its approach, in a manner consistent with statutory and tariff rule requirements, to allow a single meter configuration for the Patterson Point Project. SCE asks that the POD include the clarification and direction requested above so that SCE may apply this approach to future applicable projects.

Respectfully submitted,

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