



FILED

03/10/26

04:59 PM

A2409014

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

Application of Pacific Gas and Electric Company to Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design.	A. 24-09-014
--	---------------------

**MOTION FOR PARTY STATUS OF THE WESTERN MANUFACTURED
HOUSING COMMUNITIES ASSOCIATION**

**Edward G. Poole
Anderson & Poole
548 Market Street
PMB 85645
San Francisco, CA 94104-5401
(415) 956-6413 – Telephone
epoole@adplaw.com**

**Counsel for the Western Manufactured
Housing Community Association**

March 10, 2026

Pursuant to Rule 1.4 and 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission or “CPUC”) “ the Western Manufactured Housing Community Association (“WMA”) hereby requests to become a party to this proceeding which is considering the revenue allocation and rate design for electric service. WMA’s interest is in the electric submeter credit of Pacific Gas & Electric Company (PG&E)..

1. Background

WMA represents the owners of 1,671 manufactured housing communities, which contain 199,584 homes, distributed throughout California. In total statewide, there are 4,600 Mobile Home and RV Parks and a total of 383,000 mobile home spaces.¹ These communities provide Californians the opportunity to own their 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

¹ California Housing and Community Development, January 2020.

delivered to end-users at the individual mobile home spaces through a private distribution system, which is most often separately “submetered.”²

California Public Utilities Code Section (hereinafter “Section” or “§”) 739.5(a)³ 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.⁴ As a 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 utility rate proceedings for over 25 years. Specific to this proceeding, PG&E proposes to decrease the discount from \$3.54 to \$1.65.

² 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.

³ All code references are to the Public Utilities Code unless otherwise noted.

⁴ D.95-02-090, 58 CPUC 2d at 720, Conclusion of Law 3 and Order 1, as modified by D.95-08056, 61 CPUC 2d at 232, Order 1, D.01-08-040, p. 29, Conclusion of Law 2, as modified in D.0201-043, pp. 7-8, and D.04-11-033.

At the February 25, 2025, prehearing conference, WMA sis ask the ALJ to be elevated to party status, and the ALJ agreed. However,in a procedural email from ALJ Atamturk of today, she requested that WMA file a Motion for Party Status. As WMA intends to be an active participant in this proceeding to address the proper amount of the submeter credit, WMA requests to become a party to this proceeding.

3. **Service of Process**

For purposes of receipt of all correspondence, pleadings, orders and notices in this proceeding, the following WMA legal representative should be placed on the service list under the “party” designation:

Edward G. Poole
Anderson & Poole
548 Market Street
PMB 85645
San Francisco, CA 94104-5401
(415) 956-6413 – Telephone
epoole@adplaw.com
Counsel for the Western Manufactured Housing
Communities Association

Similarly, WMA”s expert witness should be listed as “information only”

Mary Neal
MRW & Associates, LLC, 1736 Franklin Street, Suite 700
Oakland, CA 94612
(510) 834-1999 (w)
mnn@mrwassoc.com

4. **Conclusion**

For the above reasons, the WMA respectfully requests that the Commission grant its Motion for Party Status.

Dated: March 10, 2026

Respectfully submitted,

/s/

Edward G. Poole
Anderson & Poole
548 Market Street
PMB 85645
San Francisco, CA 94104-5401
(415) 956-6413 – Telephone
epoole@adplaw.com

Counsel for the Western Manufactured
Housing Communities Association