



**FILED**

04/09/26

04:59 PM

C2604015

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

San Rafael Homeowners United, an unincorporated  
resident association

Complainant,

vs.

San Rafael Housing Opportunities, LLC,

Defendant.

Complaint  
(Rule 4.2)

COMPLAINANT	DEFENDANT
<p>SAN RAFAEL HOMEOWNERS UNITED, an unincorporated resident association</p> <p>Attn: Mariah C. Thompson, Esq. California Rural Legal Assistance, Inc. 3747 E Shields Ave Fresno, CA 93726 T: 559-441-9721 mthompson@crla.org</p> <p>Attorneys for San Rafael Homeowners United</p>	<p>SAN RAFAEL HOUSING OPPORTUNITIES, LLC.</p> <p>Attn: Bruce Davies 6653 Embarcadero Drive, Ste C Stockton, CA 95219 T: 209-932-8747 Bruce@partnersreinc.com</p> <p>Agent for Service of Process, San Rafael Housing Opportunities, LLC.</p>

**ATTORNEYS FOR COMPLAINANT**

Mariah C. Thompson, Esq.  
California Rural Legal Assistance, Inc.  
3747 E Shields Ave  
Fresno, CA 93726  
T: 559-441-9721  
mthompson@crla.org

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A) San Rafael Homeowners United

COMPLAINANT(S)

vs.

(B) San Rafael Housing Opportunities, LLC.

DEFENDANT(S)

(Include Utility "U-Number," if known)

(for Commission use only)

(C) Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?  
 YES       NO

Did you appeal to the Consumer Affairs Manager?  
 YES       NO

Has staff responded to your complaint?  
 YES       NO

Do you have money on deposit with the Commission?  
 YES       NO

Amount \$ \_\_\_\_\_

Is your service now disconnected?  
 YES       NO

COMPLAINT

(D) The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
San Rafael Homeowners United	Representative: Mariah C. Thompson, Esq.	559-441-8721
	California Rural Legal Assistance, Inc.	
	3747 E Shields Ave, Fresno, CA 97326	

respectfully shows that:

(E) Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
San Rafael Housing Opportunities	6653 Embarcadero Drive. Suite C	(209) 932-8747
	Stockton, CA 95219	

**(F)**

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

Respondent operates the mobilehome park where Petitioner's members reside. Petitioner represents the majority of residents in the 45 space mobilehome park, which has a large number of vacancies. California Rural Legal Assistance, Inc. represents Petitioner, and unincorporated resident association-- membership information can be provided confidentially if needed. Respondent bills park residents through a meter system for water service, provided by Marin Municipal Water District. Before Respondent acquired the Park in or around 2021, residents were charged for water use only. Respondent, after acquiring the park, added a "service fee" of over \$50 per resident, per month, on top of the cost of water--and the amount has increased over time. The "service fee" does not represent any fee actually charged by the water district and the Park representative has testified under oath that the only purpose of the fee is to earn a profit for the company that owns the Park. In 2024, the Park made more than \$26,000 in profits for utility charges beyond what was actually charged by the utilities. Total repair and maintenance costs for the park water infrastructure during this time were approximately \$1,000 only. Petitioner contends that the "service fee" does not represent the actual costs of maintaining the water system of providing water, because the only costs to Respondent are reading the water meters once per month, which is covered by the cost of management fees already billed to residents in their rent. Petitioner requests that the PUC set the permitted "rate" at the cost of actual rent plus actual repair costs and to refund residents all excessive fees charged for the provision of water service, which is anticipated to be thousands of dollars per resident since 2021.

**(G) Scoping Memo Information (Rule 4.2[a])**

(1) The proposed category for the Complaint is (check one):

- adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
- ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)?  YES     NO

(3)  Regular Complaint     Expedited Complaint (Rule 4.6)

(4) The issues to be considered are

(Example: The utility should refund the overbilled amount of \$78.00):

1. May the Park charge a substantial 'service fee' for the purpose of earning a profit far beyond what is necessary to maintain the limited water infrastructure in the park and provide service.
2. The Park owner should refund residents the total impermissible service fee charges since the time Respondent acquired the park.
3. The CPUC should set the appropriate fee, if any, permissible to recoup the costs of passing through water metering.

(5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.

Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09): \_\_\_\_\_

Hearing (Example: 7/1/09): \_\_\_\_\_

Explain here if you propose a schedule different from the above guidelines.

**(H)**

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

(1) Finding that Respondent's "service fee" is excessive in violation of applicable law;  
(2) Requiring Respondent to refund excessive "service fee" payments since 2021-present  
(3) Setting the service fee, if any, that Respondent may charge under the law.

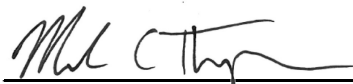
**(I)**

**OPTIONAL:** I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

mthompson@crla.org

**(J)**

Dated 4/8/26, California, this 8 day of April, 2026  
(City) (date) (month) (year)



Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

**(K)**



REPRESENTATIVE'S INFORMATION:

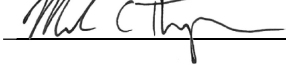
Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: Mariah C. Thompson, Esq.

Address: California Rural Legal Assistance, Inc.

Telephone Number: 559-441-8721

E-mail: mthompson@crla.org

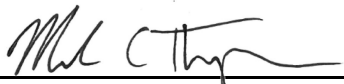
Signature: 

VERIFICATION  
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

**(L)**  
Executed on 4/8/26, at San Rafael, California  
(date) (City)

  
\_\_\_\_\_  
(Complainant Signature)

VERIFICATION  
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

**(M)**  
Executed on \_\_\_\_\_, at \_\_\_\_\_, California  
(date) (City)

\_\_\_\_\_  
Signature of Officer

\_\_\_\_\_  
Title

**(N) NUMBER OF COPIES NEEDED FOR FILING:**

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one (1) defendant, then you must submit a total of eight (8) copies.

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

**(O)** Mail paper copies to: California Public Utilities Commission  
Attn: Docket Office  
505 Van Ness Avenue, Room 2001  
San Francisco, CA 94102

## PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

**Please Note:** Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

  
\_\_\_\_\_  
Signature

4/8/26

\_\_\_\_\_  
Date

\_\_\_\_\_  
Mariah C. Thompson, Esq.

\_\_\_\_\_  
Print your name

# Profit & Loss

Property: San Rafael Housing Opportunities

01/01/24 - 12/31/24 (cash basis)

	<u>Amount</u>
INCOME	
40000 INCOME	
40006 Late Fees	1,100.00
40007 Laundry	6,382.50
40013 Rental Revenue - RV Space Inc	244,489.35
40017 HCD - MRL Protection Act	320.00
40000 Total INCOME	<u>252,291.85</u>
40020 UTILITY INCOME	
40022 Electric Income	40,175.46
40023 Garbage Income	29,470.56
40026 Sewer Income	31,909.15
40028 Water Income	34,140.02
40020 Total UTILITY INCOME	<u>135,695.19</u>
40040 INCOME OTHER	
40091 Parking Fee 1	19,753.49
40040 Total INCOME OTHER	<u>19,753.49</u>
TOTAL INCOME	<u>407,740.53</u>
EXPENSE	
60000 OPERATING EXPENSE	
60001 Advertising and Promotion	10,534.83
60013 Business Licenses and Permits	4,065.83
60031 Dues and Subscriptions	492.75
60040 Eviction Fees	57,974.71
60066 MH Titling & Registration Fees	27.00
60100 Office Supplies	907.56
63016 Legal Fees	50,250.00
60000 Total OPERATING EXPENSE	<u>124,252.68</u>
60080 INSURANCE EXPENSE	
60084 Commercial Property Ins	15,110.10
60080 Total INSURANCE EXPENSE	<u>15,110.10</u>
61000 OFF SITE MANAGEMENT FEE EXPENSE	
63011 Supplemental Offsite Mail Fee	82.60
60012 Supplemental Offsite Billing Fee	1,620.00
61001 Off Site Mgmt Base Fees	21,600.00
61000 Total OFF SITE MANAGEMENT FEE EXPENSE	<u>23,302.60</u>
62000 ON SITE MANAGER	
62002 On Site Manager - Wages	3,415.25
62003 On Site Manager - Payroll Taxes	373.22
62005 On Site Manager - Payroll Proce	125.39
62006 On Site Manager - Workers Comp	459.00
62000 Total ON SITE MANAGER	<u>4,372.86</u>
64000 REPAIR AND MAINTENANCE EXPENSE	
64004 Landscaping & Groundskeeping	1,825.00
64006 General R&M	19,447.50
64007 Sewer/Septic	1,010.00
64000 Total REPAIR AND MAINTENANCE EXPENSE	<u>22,282.50</u>
65000 TAXES	
65005 Property Tax	113,128.96
65000 Total TAXES	<u>113,128.96</u>

66000 UTILITIES	
66002 Electric	48,963.65
66004 Garbage	36,927.97
66005 Gas	1,905.19
66010 Water	21,272.97
66000 Total UTILITIES	<u>109,069.78</u>
TOTAL EXPENSE	411,519.48
OTHER INCOME	
70000 OTHER INCOME	
70001 Gains on Sale of Assets	200.00
70000 Total OTHER INCOME	<u>200.00</u>
TOTAL OTHER INCOME	200.00
OTHER EXPENSE	
70100 OTHER EXPENSE	
60006 Accounting Expense	2,500.00
65001 LLC Taxes & Fees	303.98
70110 Depreciation & Amortization	244,044.00
70120 Mortgage Interest	120,200.58
70150 Donations	454.60
70100 Total OTHER EXPENSE	<u>367,503.16</u>
TOTAL OTHER EXPENSE	367,503.16
NET INCOME	<u>-371,082.11</u>

NET INCOME SUMMARY

Income	407,740.53
Expense	-411,519.48
Other Income & Expense	<u>-367,303.16</u>
NET INCOME	<u><u>-371,082.11</u></u>



# MARIN WATER

220 Nellen Avenue  
Corte Madera, CA 94925-1105

R V PARK OF SAN RAFAEL  
6653 EMBARCADERO DR SUITE#C  
STOCKTON CA 95219

Billing Inquiries: 415.945.1400  
Water Emergency: 415.945.1500

## ACCOUNT DETAILS

Previous Balance:	=	3979.48
Payments - Thank You 11/13/2024	=	-3979.48
<b>WATER SERVICE</b>		
Service Charge	=	196.95
Watershed Management Fee:		
282 units @ \$0.62	=	174.84
Capital Maintenance Fee	=	165.40
Tiered Rates & Allotments		
Tier One: 282 units @\$10.05	=	2834.10
Tier Two: 0 units @\$18.26	=	0.00
Tier Three: 0 units @\$19.21	=	0.00
<b>Total Current Charges DUE BY 01/16/2025</b>		<b>3371.29</b>
<b>TOTAL AMOUNT DUE</b>		<b>3371.29</b>

## ACCOUNT INFORMATION

Customer Number: 344333  
Service Number: 23892  
Billing Date: 12/17/2024  
Service Address: 742 W FRANCISCO BL



## IMPORTANT INFORMATION

## WATER USAGE

Meter Read Date: 10/17/2024 - 12/12/2024

Service Number	Meter Size	Prior Reading	Current Reading	Water Use Units*
23892	1 1/2"	18743	19025	282

\*1 unit or CCF (hundred cubic feet) = 748 gallons

## YOUR WATER USE

	This Year	Last Year
Days	57	58
Units	282	334
Gallons	210936	249832
Avg Gal/Day	3701	4307



# MARIN WATER

220 Nellen Avenue  
Corte Madera, CA 94925-1105

4764001425 PRESORT PBPS004 <345>



R V PARK OF SAN RAFAEL  
6653 EMBARCADERO DR SUITE C  
STOCKTON CA 95219-3397

## UPDATE YOUR CONTACT INFORMATION

Call 415.945.1400 or go to [marinwater.org/ContactUpdate](http://marinwater.org/ContactUpdate)

Customer Number: 344333  
Service Number: 23892  
TOTAL DUE: \$3,371.29  
Current Charges Due By: 01/16/2025

## Amount Enclosed:

Please return this portion with check payable to:

**Marin Municipal Water District**

### Are You a Friend of Mt. Tamalpais?

Make a tax-deductible donation to a Marin Community Foundation fund for habitat protection, restoration of trails and historic facilities, and watershed education.

Amount \_\_\_\_\_ Thank you!

Donation included with payment, or

Separate check: "Mt Tamalpais Watershed Fund"

PARK\_000330

00344333

0000337129



RV Park of San Rafael (209) 932-8747  
 742 Francisco Blvd W, San Rafael, CA 94907  
 742 Francisco Blvd W  
 San Rafael, CA 94901

# Statement

TO:

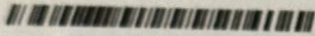
[REDACTED]  
 [REDACTED]  
 742 Francisco Blvd. W  
 San Rafael, CA 94901

Billing Period	Statement Date
04/01/25 - 04/30/25	03/31/25

Property	Unit	Type	Acc #
SRHO	[REDACTED]	RV	4449

Previous Balance	Current Charges	Current Credits	Balance Due
-899.17	865.87	0.00	0.00

Last Payment	Amount Enclosed
3/3/25 \$933.07 Check 113	



PLEASE RETURN TOP PORTION WITH YOUR REMITTANCE

Date	Reference	Description	Amount
04/01/25		Previous Balance	-899.17
04/01/25		Trash Fee	72.05
04/01/25		Water Utility	75.27
04/01/25	Readings:	Current: 03/12/25 - 77 Previous: 02/10/25 - 75 Usage: 2	
04/01/25		Electric Utility	128.10
04/01/25	Readings:	Current: 03/12/25 - 8524 Previous: 02/10/25 - 8212 Usage: 312	
04/01/25		Sewer Fee	70.13
04/01/25		Rent Charge RV	520.32

Sub Total	-33.30
Unapplied Credits	33.30
<b>Balance Due</b>	<b>0.00</b>

**Water Billing**

Consumption in CCF units	
T1 (2.000000 @ 9.780000)	19.56
T2 (0.000000 @ 12.580000)	0.00
T3 (0.000000 @ 19.950000)	0.00
Subtotal	19.56
Service Charge	55.71
Total	75.27

**PG&E Electric Standard**

Total consumption	312.000000 kWh
Days in billing cycle	30.00
Baseline for Zone X:	
9.7 x 30 days	291.000000 kWh
Tier 1 Usage:	
291.000000 kWh x \$0.40345	117.40
Tier 2 Usage:	
21.000000 kWh x \$0.50541	10.61
Tier 3 Usage:	
0.000000 kWh x \$0.50541	0.00
Subtotal:	128.01
Minimum Charge	0.00
CARE Discount	0.00
State Tax: \$0.0003/kWh	0.09
Total:	128.10

**Comments**