RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE PETITION OF WESTERN MANUFACTURED HOUSING COMMUNITY ASSOCIATION TO ADOPT, AMEND OR REPEAL A REGULATION PURSUANT TO CALIFORNIA PUBLIC UTILITIES CODE SECTION 1708.5

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Dated: September 20, 2010
RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE PETITION OF WESTERN MANUFACTURED HOUSING COMMUNITY ASSOCIATION TO ADOPT, AMEND OR REPEAL A REGULATION PURSUANT TO CALIFORNIA PUBLIC UTILITIES CODE SECTION 1708.5

Pursuant to Rule 6.3(d) of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) submits this response to the Petition of Western Manufactured Housing Community Association (WMA) to Adopt, Amend or Repeal a Regulation Pursuant to California Public Utilities Code Section 1708.5 (Petition). In the Petition, WMA basically requests that the Commission issue an order instituting rulemaking (OIR) to examine various issues related to the transfer of electric and gas service from mobilehome park (MHP) master-metered customers to the investor-owned utilities (IOUs). WMA argues that public policy supports transfers of electricity or gas service from MHP master-metered customers to the IOUs, yet few transfers have been accomplished because of the costs to the MHP master-metered customers and the uncertainties as to the terms and conditions of service transfer.

SCE does not oppose WMA’s request for an OIR to examine means of facilitating transfers of electricity or gas service from MHP master-metered customers to the IOUs. However, in SCE’s view, pursuing the transfer of ownership and operational responsibility of existing, submetered MHP systems to the IOUs will continue to be problematic given that: 1) none of the systems SCE has preliminarily reviewed meets SCE’s design and construction
standards; 2) many do not meet Housing and Community Development, county/city, and National Electric Code requirements; 3) many (if not most) have found to be unsafe and unreliable, antiquated with no remaining usefulness, and/or unable to meet the customary and expected load of the MHP community; and 4) some of these systems may require environmental mitigation as part of any upgrade to IOU standards. Cost and liability concerns associated with sub-standard, antiquated and/or poorly maintained systems will – quite rightly – continue to hinder any efforts to transfer ownership of these systems to the IOUs.

Accordingly, the Commission should consider whether there are circumstances in which the IOUs should assume responsibility for service to MHP residents currently served by master-metered customers by extending their own systems to directly serve MHP residents, rather than acquiring ownership and operational responsibility from the MHP owners for the existing submetered systems. Many of SCE’s cost and liability concerns associated with acquiring ownership and operational responsibility of MHP submetered systems may be alleviated by authorizing SCE to extend its own distribution systems to serve MHP residents. Existing line and service extension rules should apply, similar to new developments, to offset costs associated with the installation of transformers and wire, and master-metered customers would be responsible for the same costs for trenching/excavation, backfilling, conduit, substructures and new meter panels as other customers under these rules. On a discretionary basis, SCE has built new electric distribution systems in accordance with its line and service extension rules for approximately twelve MHPs whose residents were served by submetered facilities. In each case, the property owner provided easements and other rights and protections to allow SCE to individually serve the MHP residents and the owners provided the conduit, substructures, etc., as required per Rules 15 and 16. As a result, SCE assumed the obligation to serve the MHP tenant, without assuming ownership or operational responsibility of the existing MHP submetered systems.

Any effort to direct the IOUs to assume responsibility for service to MHP residents by having the IOUs extend their own systems to directly serve MHP residents, rather than forcing
the IOUs to acquire ownership and operational responsibility for submetered systems, should entail:

- Criteria for eligibility and prioritizing the transfers of service to the IOUs.

- Mechanisms for the IOUs to recover their costs associated with extending service to MHP residents that are currently served by master-metered customers. To the extent the IOUs are required to directly serve MHP residents, they should have assurance that costs associated with extending their systems to directly serve MHP residents will be recovered, just as for any other new utility service connections.

- Obligations of the MHP owners for any submetered facilities that may remain in place (and continue to be owned by the MHP owner) once the IOU extends its system in parallel and assumes service obligations for the MHP residents.

- Protections for the IOUs from any liabilities associated with submetered facilities that may remain in place (and continue to be owned by the MHP owner) once the IOU extends its system in parallel and assumes service obligation for the MHP residents.

- Rights of way, easements and other rights the IOU would require from the MHP owner to assume the obligation of service to MHP residents.

- Means for ensuring that the connections to each individual MHP residence meets applicable building code standards prior to the transfer of service obligation to the IOU.

- Other terms and conditions for transfer of service. Many terms and conditions that the Commission approved in 1997 for the transfer of ownership and operation of submetered facilities may be appropriate in the context of a transfer of service
obligation only. See SCE’s Advice 1260-E, filed November 14, 1997, submitting Form 14-697, Proposal to Purchase and Agreement for Transfer of Ownership of Distribution System, which was approved by the Commission on December 24, 1997.†

SCE appreciates the opportunity to submit this response.

Respectfully submitted,

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/s/ Janet S. Combs
By: Janet S. Combs

Attorneys for
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September 20, 2010

† Available at www.sce.com/AboutSCE/Regulatory/adviceletters/approved.htm.
CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this day served a true copy of **RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE PETITION OF WESTERN MANUFACTURED HOUSING COMMUNITY ASSOCIATION TO ADOPT, AMEND OR REPEAL A REGULATION PURSUANT TO CALIFORNIA PUBLIC UTILITIES CODE SECTION 1708.5** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **22nd day of September, 2010**, at Rosemead, California.

/s/ Melissa Schary
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