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SEP 11 1995

Decision 95-09-015 September 7, 1995

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) for Authority to Increase Its Authorized Level of Base Rate Revenue Under the Electric Revenue Adjustment Mechanism for Service Rendered Beginning January 1, 1992 and to Reflect This Increase in Rates. (U 338-E)	Application 90-12-018 (Filed December 7, 1990)

ORIGINAL

(See Decision (D.) 91-12-076, D.92-06-020, and D.92-12-022 for appearances.)

Additional Appearance

Graham & James, by Peter W. Hanschen, Attorney at Law, for Agricultural Energy Consumers Association, interested party.

SEP 11 1995

OPINION ON MASTER-METER ADJUSTMENTS

1.0 Summary

The Commission adopts the Joint Recommendation of Southern California Edison Company (Edison) and Western Mobilehome Parkowners Association (WMA) regarding Schedule DMS-2 applicable to master-metered mobile home parks. Pursuant to the Joint Recommendation, the submetering discount is increased from 18¢ per space per day to 27¢ per space per day. Initially, Edison had proposed a discount of 22¢ per space per day. WMA had proposed a discount of 40¢ per space per day.

Also, the Commission addresses other uncontested issues related to rate schedules for multifamily accommodations.

2.0 Procedural Summary

On December 23, 1993, WMA filed a proposal in Edison's 1994 Rate Design Window Proceeding, in Application (A.) 90-12-018, regarding the level of the Schedule DMS-2 Submetering Discount. Edison commented on WMA's proposal on January 24, 1994. Following an Administrative Law Judge's (ALJ) ruling, this issue was separated from Edison's other Rate Design Window proceeding proposals.

On March 28, 1994, Edison served its Test Year 1995 General Rate Case (1995 GRC) Pricing Proposal in A.93-12-025, which contained proposed master-meter adjustments associated with all of Edison's master-meter domestic rate schedules. These issues were to be litigated in Phase 2 of Edison's 1995 GRC. That phase of the proceeding, however, was delayed on November 9, 1994 and the Commission ordered that consideration of the master-meter adjustments be transferred to Edison's pending 1994 Rate Design Window proceeding in A.90-12-018.

Pursuant to an ALJ's ruling dated December 29, 1994, Edison served its master-meter adjustments testimony in this proceeding on January 19, 1995. WMA served its testimony on

February 23, 1995, and Edison served its updated and rebuttal testimony on March 23, 1995. WMA also served additional direct testimony on replacement costs and return on investment on April 6, 1995. Evidentiary hearings began on April 11, 1995, but were continued to a later date pending settlement discussions. WMA and Edison were able to resolve their differences regarding the level of the Schedule DMS-2 Submetering Discount and prepared the Joint Recommendation (Exhibit 607). Evidentiary hearings resumed on May 30, 1995 for consideration of the Joint Recommendation. The case was submitted on June 23, 1995, upon the filing of a brief by Edison.

WMA and Edison are the only parties that served testimony and actively participated in this phase. The Division of Ratepayer Advocates (DRA) was present at the evidentiary hearings, but took no formal position on the master-meter adjustments issue.

3.0 Summary of Master-Meter Schedules

Edison has four master-meter schedules: Schedules DM, DMS-1, DMS-2, and DMS-3. Schedule DM is a master-meter schedule applicable to multifamily accommodations, such as apartment buildings, duplexes, or mobile home parks, residential hotels, and qualifying recreational vehicle (RV) parks. Electric service under Schedule DM is provided through a master meter, but submetering for the purpose of billing the tenants is not allowed.

Schedules DMS-1, DMS-2, and DMS-3 are master-meter schedules that permit submetering. Electric service is provided through a master meter to the customer, who in turn supplies service to tenants through a submetered system, owned, operated, and maintained by the customer. The customer reads the submeters and bills the tenants at the same rates that Edison would charge if Edison were providing service directly to the tenants. Schedule DMS-1 is applicable to multifamily accommodations, such as apartment buildings or duplexes; Schedule DMS-2 is applicable to mobile home parks and multifamily accommodations on single premises; and Schedule DMS-3 is applicable to qualifying RV parks where all of the RV spaces in the park, or all of the spaces in the specified portion of the park, are separately submetered and reserved for prepaid month-to-month tenants.

With certain adjustments, all four of the schedules are based on Schedule D - Domestic Service. Customers taking service on these schedules are entitled to a baseline allowance for each single-family dwelling served through the master meter, and may also qualify for one or more medical baseline allowances. Schedules DM, DMS-1, and DMS-2 each contain a Diversity Adjustment which reflects the difference between: (1) the baseline and non-baseline kilowatt-hours used for billing master-metered customers; and (2) the baseline and non-baseline usage of the master-meter customer's tenants. A diversity benefit exists when the master-meter customer has more kilowatt-hours billed at baseline rates and fewer billed at non-baseline rates than are actually consumed by the tenants. This diversity of use occurs because master-meter customers are provided a baseline allowance for each occupied unit supplied by the master-meter, despite the fact that some of the tenants may consume less than their baseline quantity while others consume more. Without this adjustment, baseline allowances provided to master-meter customers could be greater than the actual baseline consumption and result in these customers being subsidized by Edison's other customers.

Schedules DMS-1 and DMS-2 also provide a Submetering Discount, which reflects the average cost of providing service from the master meter to the submetered customers. Public Utilities (PU) Code § 739.5 requires that the Commission establish a discount from the standard domestic rate, Schedule D, to reflect the average cost of providing service from the master meter to the submetered customer. This discount, however, cannot exceed the average cost the utility would incur to provide service directly to the tenant.

The Submetering Discount for Schedule DMS-1 contains a cost-of-service component. The Submetering Discount for Schedule DMS-2 contains a cost-of-service component and a line loss adjustment.

4. Uncontested Issues

The following issues are uncontested by the parties in this proceeding and are adopted as described below:

A. The Diversity Adjustment for Schedules DM and DMS-1 should equal a negative 2¢ per space per day. This Diversity Adjustment is based on the same methodology and 80 apartment site sample used to develop the Schedules DM and DMS-1 Diversity Adjustment in Edison's Test Year 1992 General Rate Case (1992 GRC). The only change to the 1992 GRC study is the inclusion of more recent recorded information.

B. The Submetering Discount on Schedule DMS-1, which includes a cost-of-service component and a Diversity Adjustment, should continue to be set so that the current ratio between the Submetering Discounts for Schedules DMS-1 and DMS-2 are maintained. Given WMA's and Edison's Joint Recommendation, the Schedule DMS-1 Submetering Discount should be set at 6¢ per space per day, which consists of a cost of service component of 8¢ per space per day and Diversity Adjustment of a negative 2¢ per space per day.

C. The Minimum Average Rate (MAR) provision should continue to be applied to the Schedule DMS-1 customers, ensuring that the customers pay at least Edison's average cost of fuel and purchased power, and the Public Utilities Commission Reimbursement Fee (PUCRF). The MAR should continue to be set equal to the sum of the average annual Domestic Energy Cost Adjustment Billing Factor (ECABF), the Annual Energy Rate (AER), and the PUCRF. Applicable low income discounts under the California Alternate Rates for Energy (CARE) program[1] should continue to be subtracted from the customer's bill after the MAR is applied to provide eligible tenants with the full benefit of the CARE program without adversely affecting master-meter customers. This provision should be revised every time there is a Domestic Customer Group rate level change.

D. The Minimum Charge, also known as the Base Rate Energy Charge (BREC) provision should continue to be applied to the Schedule DMS-1 customers, ensuring that the customers contribute positive base rate revenues. The BREC is set equal to the Annualized Base Energy Rate on Schedule D.

E. The Schedule DMS-1 Submetering Discount should be adjusted to reflect the implementation of the Basic Charge if it is adopted in the Pricing Phase of Edison's 1995 GRC. The adjustment would be set equal to the amount of the Basic Charge on Schedule D and is necessary because Schedule DMS-1 customers will recover this Basic Charge from their tenants.[2]

F. The tenants of Schedule DMS-3 customers should be provided the same baseline allowances provided to Schedule DM customers. Like tenants of customers on Schedule DMS-3, Schedule DM customers typically live in smaller dwellings and have lower average use. It is thus appropriate to provide tenants of Schedule DMS-3 customers baseline allowances comparable to the baseline allowance on Schedule DM.

1 The CARE program was formerly known as the Low Income Ratepayer Assistance (LIRA) program.

2 In the event the Basic Charge level exceeds the Submetering Discount provided by Edison, the master meter customer's bill would be increased by the amount the Basic Charge exceeds the Submetering Discount, multiplied by the number of spaces and the number of days in the billing period.

> The Schedule DMS-3 customer's bill should be adjusted to reflect the implementation of the Basic Charge if it is adopted in the Pricing Phase of Edison's 1995 GRC. This adjustment will be set equal to the amount of the Basic Charge on Schedule D and is necessary because Schedule DMS-3 customers would recover the Basic Charge directly from their tenants.[3]

5.0 Joint Recommendation

At the outset of this proceeding, WMA and Edison had differing proposals with regard to the level of the Schedule DMS-2 Submetering Discount, the method for adjusting that Submetering Discount in future years, and the appropriateness of the MAR and BREC provisions. As stated above, however, WMA and Edison reached an agreement on these issues and provided the Commission a Joint Recommendation for the adoption of the proposed changes to the Schedule DMS-2 Submetering Discount. The Joint Recommendation resolves the issues associated with the Schedule DMS-2 Submetering Discount through the year 2001. It approximates Edison's cost of providing comparable service to directly metered mobile home parks and, thus, implementation of the Schedule DMS-2 Submetering Discount is consistent with Section 739.5. The Joint Recommendation also provides a fair and uncomplicated escalation mechanism which approximates Edison's future cost of providing comparable service to directly serviced mobile home parks and thus ensures that the discount will continue to be consistent with Section 739.5. The Joint Recommendation was not contested and is adopted as described below:

A. The Schedule DMS-2 Submetering Discount should be set at 27¢ per space per day.

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3 The master-meter customer's bill would be increased by the amount of the Basic Charge multiplied by the number of spaces and the number of days in the billing period.

This consists of a cost-of-service component of 23¢ per space per day, a line loss adjustment of 4¢ per space per day, an energy theft adjustment of 1¢ per space per day, and a Diversity Adjustment of negative 1¢ space per day.

B. The cost-of-service component of the Schedule DMS-2 Submetering Discount, 23¢ per space per day, should be adjusted annually based upon the indexing formula ultimately adopted for Edison in Phase 1 of its Performance Based Ratemaking (PBR) proceeding, A.93-12-029. In the event that the Commission retains an attrition mechanism as opposed to a PBR indexing formula, the Operation and Maintenance (O&M) portion of the cost-of-service component, 11¢ per space per day, should be adjusted annually, during non-general rate case test years, based on the composite distribution, customer accounts, and administrative and general O&M expense (collectively referred to as O&M expense) escalation rate of the attrition mechanism adopted for Edison.[4] The capital-related portion of the cost-of-service component should remain unchanged under an attrition-based methodology. For 1998, the anticipated general rate case test year associated with an attrition mechanism, the O&M expense portion of the cost-of-service discount would be adjusted by the escalation rate used to forecast O&M expenses from 1997 to 1998.[5] Any changes

4 The composite escalation rate shall be derived from Edison's attrition calculation by applying the labor escalation factor to the base year labor O&M expenses and applying the nonlabor escalation factor to the base year nonlabor O&M expenses. The base year is the year prior to the attrition year. The composite rate will equal the total of the escalated labor and nonlabor O&M expenses, divided by the total labor and nonlabor base year O&M expenses.

5 The escalation rate will be derived from the escalation rate adopted in that general rate case.

to the PBR or attrition mechanism which are directly related to the methodology described above for developing the Submetering Discount or the creation of an alternative mechanism by the Commission for establishing Edison's annual revenue requirement should be reflected in the annual adjustments for the cost-of-service component. In any event, the line loss, energy theft, and Diversity Adjustments should remain unchanged through the term of the Joint Recommendation. The Submetering Discount as adjusted should remain in effect through the end of 2001 unless Section 739.5 is revised so that the level of the Submetering Discount is no longer limited to Edison's cost of providing comparable service.

C. The MAR provision should continue to be applied to the Schedule DMS-2 Submetering Discount, ensuring that the customers pay at least Edison's average cost of fuel and purchased power, and the PUCRF. The MAR should continue to be set equal to the sum of the average annual Domestic ECABF, the ABR, and the PUCRF. Applicable low-income discounts under the CARE program should continue to be subtracted from the customer's bill after the MAR is applied to provide eligible tenants with the full benefit of the CARE program, without adversely affecting master-meter customers. This provision should be revised every time there is a Domestic Customer Group rate level change.

D. The Minimum Charge, also known as BREC, provision should continue to be applied to the Schedule DMS-2 Submetering Discount, ensuring that the customers contribute positive base rate revenues. The BREC is set equal to the Annualized Base Energy Rate on Schedule D.

E. The Schedule DMS-2 Submetering Discount should be adjusted to reflect the implementation of the Basic Charge as it is adopted in the Pricing Phase of Edison's 1995 GRC. The adjustment would be set equal to the amount of the Basic Charge on Schedule D and is necessary because Schedule DMS-2 customers will recover this basic charge directly from their tenants.

The Joint Recommendation is attached as Appendix A. A comparison of the initial proposals of Edison and WMA, and the Joint Recommendation is set forth in a Joint Comparison Exhibit attached as Appendix B.

6.0 Discussion

We find that given the several rounds of testimony issued by Edison and WMA with regard to the submetering discount issues in this proceeding and the settlement discussions that took place, mobile home park owners, submetered tenants and the utility's ratepayers are assured that a reasonable settlement of the level of the master-meter discount was reached. Further, we believe that the Joint Recommendation is reasonable in light of the whole record, consistent with the law, and in the public interest. The Joint Recommendation, attached as Appendix A is approved pursuant to Rules 51 through 51.10 of the Rules of Practice and Procedure. (See also, San Diego Gas & Electric Company (1992) 46 CPUC2d 538.)

We note that the Joint Recommendation provides that the level of the Schedule DMS-2 Submetering discount, as escalated, will remain in effect through the end of the year 2001 unless PU Code § 739.5 is revised. We remind the parties that the Commission will not be bound by this provision of the Joint Recommendation. The Commission, after evidentiary hearing, could change the methodology for calculating the submetering discount if a need for such a change becomes apparent. Also, we note that Edison and WMA have reserved the right to "advocate different principles or methodologies" in the future (Ap. A, p. 7, Item 3), and have not agreed to bar evidence to support such advocacy. We expect therefore that these parties may present evidence supporting changes not approved herein before the year 2001.

Findings of Fact

1. Following several rounds of prepared testimony, Edison and WMA executed a Joint Recommendation regarding the master-meter discount under Schedule DMS-2 applicable to master-metered mobilehome parks.

2. The Joint Recommendation, attached as Appendix A, was served on all parties and was the subject of an evidentiary hearing held on May 30, 1995.

3. There is no opposition to the Joint Recommendation or to resolution of the uncontested issues as discussed in Section 4 above.

Conclusion of Law

The Joint Recommendation and the uncontested issues should be approved as reasonable in light of the whole record, consistent with the law, and in the public interest.

ORDER

IT IS ORDERED that:

1. The Joint Recommendation of Southern California Edison Company (Edison) and Western Mobilehome Parkowners Association attached as Appendix A shall be adopted.

2. Resolution of the uncontested issues, as discussed in Section 4 above, shall be adopted.

3. Edison is authorized to file the[6] tariff sheets attached as Appendix C that are not currently effective. The tariff sheets shall be effective no sooner than 5 days from the date of filing.

4. Edison's 1994 Rate Design Window proceeding is closed.

This order is effective today.

Dated September 7, 1995, at Los Angeles, California.

DANIEL Wm. FESSLER
President
P. GREGORY CONLON
JESSIE J. KNIGHT, JR.
HENRY M. DUQUE
Commissioners

I CERTIFY THAT THIS DECISION WAS APPROVED BY THE ABOVE COMMISSIONERS TODAY

Wesley Franklin Jr

Acting Executive Director

6 For the sake of clarity, Appendix C includes tariff sheets that are currently effective.

Application No: 90-12-018
Exhibit No:

Western Mobilehome Parkowners Association

and

Southern California Edison Company
(U 338-E)

Joint Recommendation Regarding The Schedule DMS-2 Submetering Discount

Before the
Public Utilities Commission of the State of California

Rosemead, California
May 1995

Western Mobilehome Parkowners Association And Southern California Edison Company's Joint Recommendation Regarding The Schedule DMS-2 Submetering Discount

I.

INTRODUCTION

The Western Mobilehome Parkowners Association ("WMA") and Southern California Edison Company ("Edison"), collectively referred to herein as the "Parties," have reached an agreement regarding the level of the Schedule DMS-2 Submetering Discount and jointly recommend that the California Public Utilities Commission ("Commission") adopt the proposed changes to Schedule DMS-2 discussed below.

II.

BACKGROUND

Schedule DMS-2 is a master-meter schedule applicable to mobilehome park multi-family accommodations on a single premises where all mobilehome units are separately submetered. Electric service is provided through a master meter to the customer, who in turn supplies service to tenants through a submetered system owned, operated, and maintained by the customer. The customer reads the submeters and bills the tenants at the same rates that Edison would charge if it were providing the service directly to the tenants. The rates charged to Schedule DMS-2 customers are based on Schedule D, but allow for a Submetering Discount which is composed of a cost of service component, line loss adjustment, and diversity adjustment. The cost of service component represents the cost of installing, operating, and maintaining the submetered system.[1] The adjustment for line losses reflects the estimated amount of distribution line losses within the mobilehome parks. The diversity adjustment reflects the revenue difference between the baseline kilowatthours used for billing the Schedule DMS-2 customers and the actual amount of baseline kilowatthours consumed by their tenants. In addition, consistent with Decision No. 92-06-020, the Submetering Discount will also reflect an adjustment for energy theft within the mobilehome parks.

In March 1994, Edison served its Test Year 1995 General Rate Case ("1995 GRC") Pricing Proposal, which contained proposed master-meter adjustments associated with Edison's master-metered domestic rate schedules, including Schedule DMS-2. In November 1994, the Commission delayed the Pricing Phase of Edison's 1995 GRC and ordered that the consideration of master-meter adjustments be moved to Edison's pending 1994 Rate Design Window proceeding in Application No. 90-12-018. (D.94-11-022, Paragraph No. 4, pp. 9 - 14) Pursuant to the presiding Administrative Law Judge's Ruling dated December 29, 1994, Edison served its master-meter adjustment testimony in this proceeding on January 19, 1995. WMA served its testimony on February 23, 1995, and Edison served its updated and rebuttal testimony on March 23, 1995. Evidentiary hearings began on April 11, 1995, but were continued to a later date pending settlement discussions.

In its direct testimony, Edison proposed that the level of the Schedule DMS-2 Submetering Discount be set at $0.20 per space, per day. This proposal was later updated, in Edison's rebuttal testimony, to $0.22 per space, per day, which reflects a cost of service component of $0.19, line loss adjustment of $0.04, energy theft adjustment of $0.01, and a diversity adjustment of negative $0.02. In its direct testimony, WMA proposed a $0.40 per space, per day, Submetering Discount, which reflects a cost of service component of $0.36, line loss adjustment of $0.04, energy theft adjustment of $0.01 and a diversity adjustment of negative $0.01. WMA's proposal is based on its proposed revisions to Edison's cost of service study and diversity study. WMA also asserted that the master-meter customers' reasonable average cost of providing submetered service within Edison's service territory is higher than Edison's comparable costs.

Edison proposed that the cost of service component be escalated in future years based on the indexing formula adopted for Edison in Phase I, the non-generation phase, of its Performance-Based Ratemaking ("PBR") proceeding, Application No. 93-12-029. Alternatively, in the event a normal attrition mechanism is adopted instead of Edison's PBR mechanism, Edison proposed that the operation and maintenance ("O&M") expense portion of the cost of service component be adjusted annually based upon the O&M expense component of that attrition mechanism with no adjustment to the capital cost portion. WMA proposed that the cost of service component be revised to reflect plant cost in 1996 and escalated in 1997 based upon Edison's attrition mechanism. In its original filing, Edison had updated the plant costs adopted in Phase II of its Test Year 1992 General Rate Case through 1992. In its rebuttal testimony, Edison further updated the plant costs to reflect the forecasted plant expenditures through 1995.

Edison also proposed that the Minimum Average Rate ("MAR") and Base Rate Energy Charge ("BREC") provisions continue to be applied to the Schedule DMS-2 customers, ensuring that the customers pay at least Edison's average cost of fuel and purchased power and the Public Utilities Commission Reimbursement Fee ("PURCF"), and contribute positive base rate revenues. WMA opposed the MAR and BREC provisions.

Finally, Edison proposed that the Schedule DMS-2 Submetering Discount be adjusted to reflect the implementation of the Basic Charge it proposed in the Pricing Phase of Edison's 1995 GRC. WMA did not object to this proposal.

WMA and Edison are the only parties that served testimony and actively participated in this proceeding. Prior to the removal of the master-meter adjustment issues from the Pricing Phase of Edison's 1995 GRC, the Division of Ratepayer Advocates ("DRA") specifically chose to remain silent on the level of the Schedule DMS-2 Submetering Discount, stating that "Edison and an active intervenor can be expected to adequately cover the range of issues in sufficient detail." (A.93-12-025, DRA's Report On

Marginal Cost, Revenue Allocation and Rate Design, (pp. 1-3) DRA was present at the evidentiary hearing, but took no formal position on the master-meter adjustment issues in this proceeding.

III.
RECOMMENDATION

Based on the direct and rebuttal testimony and additional information exchanged through discovery and settlement proceedings, WMA and Edison have reached an agreement on their respective positions and jointly recommend that the Commission authorize a $0.27 per space, per day, Schedule DMS-2 Submetering Discount. The components of the recommended discount are shown in Table III-1 below.

Table III-1
Joint Schedule DMS-2
Submetering Discount Recommendation

Line No.	Component/Adjustment	$/Space/Day
1.	Cost of Service	
2.	O&M	$0.11
3.	Capital	0.12
4.	Subtotal	0.23
5.	Line Loss	0.04
6.	Energy Theft	0.01
7.	Diversity	(0.01)
8.	TOTAL	$0.27

The Parties intend that the cost of service component of the Schedule DMS-2 Submetering Discount, $0.23 per space, per day, will be adjusted annually based upon the indexing formula ultimately adopted for Edison in Phase I of its PBR proceeding.[1/] In the

1/ The Parties will formally request that the Commission not consider WMA's proposal in Edison's PBR proceeding given that the issue will be resolved upon the Commission's adoption of this Joint Recommendation.

event that the Commission retains an attrition mechanism as opposed to a PBR indexing formula, the Parties intend that the O&M expense portion of the cost of service component, $0.11 per space, per day, will be adjusted annually, during non-general rate case test years, based upon the composite distribution, customer accounts, and administrative and general O&M expense (collectively referred to as "O&M expense") escalation rate of the attrition mechanism adopted for Edison.[2] The capital-related portion of the cost of service component will remain unchanged under an attrition-based methodology. For 1998, the anticipated general rate case test year associated with an attrition mechanism, the O&M expense portion of the cost of service discount will be adjusted by the escalation rate used to forecast O&M expenses from 1997 to 1998.[3] Any changes to the PBR or attrition mechanism which are directly related to the methodologies described above for developing the Submetering Discount, or the creation of an alternative mechanism by the Commission for establishing Edison's annual revenue requirement will be reflected in the annual adjustment for the cost of service component. In any event, the line loss, energy theft, and diversity adjustments will not be changed through the term of this Joint Recommendation. The Submetering Discount as adjusted will remain in effect through the end of the year 2001.

Edison recommends that the MAR and BREC provisions currently in place continue to be applied to Schedule DMS-2. WMA does not object to this recommendation. These provisions are revised every time there is a Domestic Customer Group rate level change so that the customers pay at least Edison's average cost of fuel and purchased power and the PUCRF, and contribute positive base rate revenues.

2/ The composite escalation rate shall be derived from Edison's attrition calculation by applying the labor escalation factor to the base year labor O&M expenses and applying the non-labor escalation factor to the base year non-labor O&M expenses. The base year is the year prior to the attrition year. The composite rate will equal the total of the escalated labor and non-labor O&M expenses, divided by the total labor and non-labor base year O&M expenses.

3/ The escalation rate will be derived from the escalation rate adopted in the general rate case.

Finally, in the event the Commission adopts the Basic Charge proposed in the Pricing Phase of Edison's 1995 GRC, the Parties recommend that the Schedule DMS-2 Submetering Discount be adjusted to reflect its implementation. (A.93-12-025, Edison's Pricing Proposal (Updated), pp. 64-68) The adjustment would be set equal to the amount of the Basic Charge on Schedule D and is necessary because Schedule DMS-2 customers will recover this Basic Charge directly from their tenants.

The Joint Recommendation approximates Edison's cost of providing comparable service to directly metered mobilehome parks[4] and, thus, implementation of this discount will be consistent with Section 739.5 of the Public Utilities Code of California. This Joint Recommendation also provides a fair and uncomplicated escalation mechanism which approximates Edison's future cost of providing comparable service to directly metered mobilehome parks, and thus ensures that the discount will continue to be consistent with Section 739.5. The revised tariff sheets reflecting this Joint Recommendation are provided in Appendix A.

IV.

SCOPE, LIMITATIONS, AND CONDITIONS

The Parties agree to the following scope, limitations, and conditions to this Joint Recommendation:

1. The level of the Schedule DMS-2 Submetering Discount proposed in this Joint Recommendation, as escalated, shall remain in effect through the end of the year 2001 unless Section 739.5 is revised so that the level of the Submetering Discount is no longer limited to Edison's cost of providing comparable service;

4/ WMA in its direct testimony asserted that the master-meter customers' reasonable average costs of providing submetered service in Edison's service territory is higher than Edison's costs of providing comparable service.

2. This Joint Recommendation shall not be construed to be acceptance by the Parties of the principles, methodologies, data, components, arguments, or positions taken independently by any parties in this proceeding;

3. The Parties expressly reserve the right to advocate different principles or methodologies from those underlying this Joint Recommendation when the level of the Schedule DMS-2 Submetering Discount is reevaluated;

4. None of the principles or the methodologies underlying this Joint Recommendation shall be deemed by the Commission or any other entity to be precedent in any proceeding or in any litigation except in order to implement in this proceeding the recommendations contained herein;

5. The Parties understand and agree that this Joint Recommendation is subject to each and every condition set forth herein, including its acceptance by the Commission in its entirety and without change or condition;

6. If the Commission rejects this Joint Recommendation, the Parties request that additional hearings be scheduled in this proceeding;

7. The Parties agree to extend their best efforts to ensure the adoption of this Joint Recommendation by the Commission and will not contest in this proceeding, either in hearings or in any other manner before the Commission, the recommendations contained herein; and

8. The Parties are unaware of any opposition to this Joint Recommendation by any person or entity and agree to actively defend this Joint Recommendation and develop a mutually acceptable defense if its approval is opposed by others who are not parties to this Joint Recommendation.

EXECUTION

The undersigned, on behalf of the Parties they represent in this proceeding, hereby agree to abide by the conditions and recommendations set forth in this Joint Recommendation. This Joint Recommendation may be signed in counterparts.

Respectfully submitted,

BIDDLE & HAMILTON

By: ______________________
Richard L. Hamilton
Attorneys for
Western Mobilehome Parkowners Association

Dated: May 10, 1995

SOUTHERN CALIFORNIA EDISON COMPANY

By: ______________________
James P. Scott Shotwell
Attorney for
Southern California Edison Company

Dated: May 9, 1995

(END OF APPENDIX A)

JOINT COMPARISON EXHIBIT

1994 RATE DESIGN WINDOW PROCEEDING
MASTER-METER ADJUSTMENT PHASE
UPDATED JOINT COMPARISON EXHIBIT

(Unless Otherwise Specified, All Figures In $/Space/Day)

Line No.	Schedule	Issue	Present	Edison's Proposal (Updated)	WMA's Proposal	Joint Recommendation	Final Proposal
1.	DM	Diversity Adj.	(0.03)	(0.02)	no position	none	(0.02)
2.	DMS-1	Submetering Discount					
3.		Cost of Service Comp.[1]	0.06	0.07	no position	none	0.08
4.		Diversity Adj.	(0.03)	(0.02)	no position	none	(0.02)
5.		TOTAL	0.03	0.05	no position	none	0.06
6.		Minimum Average Rate	$0.04856/kWh	Continue provision updated for effective rate levels	no position	none	Continue provision updated for effective rate levels
7.		Base Rate Energy Charge	$0.08148/kWh	Continue provision updated for effective rate levels	no position	none	Continue provision updated for effective rate levels
8.		Basic Charge	N/A	Adjust Submetering Discount to reflect Domestic Basic Charge if adopted[2]	no position	none	Adjust Submetering Discount to reflect Domestic Basic Charge if adopted

[1] The Schedule DMS-1 Submetering Discount is set to maintain the current ratio with the Schedule DMS-2 Submetering Discount.

[2] In the event that the Basic Charge level exceeds the Submetering Discount provided by Edison, the master-metered customer's bill would be increased by the amount the Basic Charge exceeds the Submetering Discount multiplied by the number of spaces and the number of days in the billing period.

Line No.	Schedule	Issue	Present	Edison's Proposal (Updated)	WMA's Proposal	Joint Recommendation	Final Proposal
9.	DMS-2	Submetering Discount					
10.		Cost of Service Comp.	0.18	0.19	0.36	0.23	0.23
11.		Line Loss Comp.	0.03	0.04	0.04	0.04	0.04
12.		Energy Theft Adj.	N/A	0.01	0.01	0.01	0.01
13.		Diversity Adj.	(0.03)	(0.02)	(0.01)	(0.01)	(0.01)
14.		TOTAL	0.18	0.22	0.40	0.27	0.27
15.		Attrition	N/A	PBR/Attrition	Attrition	PBR/Attrition[1]	PBR/Attrition
16.		Minimum Average Rate.	$0.04856/kWh	Continue provision updated for effective rate levels	Eliminate provision	Continue provision updated for effective rate levels	Continue provision updated for effective rate levels
17.		Base Rate Energy Charge	$0.08148/kWh	Continue provision updated for effective rate levels	Eliminate provision	Continue provision updated for effective rate levels	Continue provision updated for effective rate levels
18.		Basic Charge	N/A	Adjust Submetering Discount to reflect Domestic Basic Charge if adopted	Adjust Submetering Discount to reflect Domestic Basic Charge if adopted	Adjust Submetering Discount to reflect Domestic Basic Charge if adopted	Adjust Submetering Discount to reflect Domestic Basic Charge if adopted
19.	DMS-3	Baseline Allowances	Set equal to Schedule D	Set equal to Schedule DM	no position	none	Set equal to Schedule DM
20.		Basic Charge	N/A	Adjust customer's bill to reflect the Domestic Basic Charge if adopted[2]	no position	none	Adjust customer's bill to reflect the Domestic Basic Charge if adopted

[1] In the event that a PBR Index formula is not adopted for Edison, the mechanisms ultimately adopted for Edison will be utilized through 2001.

[2] In the event that the Basic Charge level exceeds the Submetering Discount provided by Edison, the master-metered customer's bill would be increased by the amount the Basic Charge exceeds the Submetering Discount multiplied by the number of spaces and the number of days in the billing period.

(LW952050 088)

(END OF APPENDIX B)

APPENDIX C

TARIFF SHEETS

Schedule DM Sheet 1 of 3

MULTIFAMILY ACCOMMODATION - RESIDENTIAL HOTEL - QUALIFYING RV PARK

APPLICABILITY

Applicable to domestic service including lighting, heating, cooking, and power use or combination thereof in a multifamily accommodation, a residential hotel, or qualifying recreational vehicle (RV) park on a single premises where all of the single-family accommodations are not separately submetered. Closed to new installations as of June 13, 1978, except for Residential Hotels and Qualifying RV Parks.

TERRITORY

Within the entire territory served.

RATES

The rate of the single-family domestic rate schedule, Schedule D, shall be adjusted as follows:

Energy Charge:

The baseline quantity to be billed under rates designated as applicable to Baseline Service shall be determined by multiplying the applicable baseline quantities set forth below in Special Condition No. 8, by the number of single-family accommodations in (1) a multifamily accommodation; or (2) qualifying residential units in a residential hotel; or (3) qualifying RV units in a qualifying RV park; plus any eligible Medical Baseline Allocations.

Diversity Adjustment:

Base Rate charges shall be increased by $0.02 per single-family accommodation in a multifamily accommodation or qualifying residential unit in a residential hotel, or qualifying RV unit in a qualifying RV park, per day for diversity of baseline use by tenants.

Minimum Charge:

The Minimum Charge shall be the same as set forth in Schedule D.

SPECIAL CONDITIONS

1. Seasonal Service: For summer cottage customers and others who normally require service for only part of the year, service under this schedule may be applicable only on annual contract.

2. Notification: It is the responsibility of the customer to advise the Company within 15 days following any change in the number of single-family accommodations in a multifamily accommodation, residential units in a residential hotel, or qualifying RV units in a qualifying RV park that qualify for basic Baseline allocations, and any change in qualifications for other than Basic Baseline allocations.

MULTIFAMILY ACCOMMODATION - RESIDENTIAL HOTEL - QUALIFYING RV PARK

(Continued)

SPECIAL CONDITIONS (Continued)

3. Qualifying Residential Unit: A residential unit in a residential hotel as defined in Rule No. 1, Definitions, leased for a minimum of one month and occupied (excluding organizations or groups of persons) as a permanent primary residence for at least nine months of the year.

4. Qualifying RV Park: An RV park which has at least 50% of its spaces on the same company meter occupied at least nine months of the year by a tenant in a qualifying RV unit used as a permanent residence and renting on a month to month basis. Such meter shall not include nondomestic enterprises as described in Special Condition No. 7.

5. Qualifying RV Unit: An RV Unit that is used as a permanent single-family residence at the same location in an RV park for at least nine months out of the year. Baseline allocations shall be based on the number of units that meet this criteria.

6. Miscellaneous Loads: Miscellaneous electrical loads on the same meter such as general lighting, laundry rooms, general maintenance, and other similar usage incidental to the operation of a multifamily accommodation will be considered as domestic usage.

7. Nondomestic Enterprises: Electric energy used for nondomestic enterprises such as offices, stores, shops, restaurants, service stations, and other similar establishments will be separately metered and billed under applicable schedules.

8. Baseline Allocations: The applicable baseline quantity of electricity to be billed under rates designated as applicable to Baseline Service shall be the total of any Medical Baseline Allocation permitted under Preliminary Statement, Part H, Paragraph 4, plus the applicable daily baseline quantities for the customer's Baseline Region (as described on the Baseline Region Maps and in the boundary descriptions which are in conjunction with such Baseline Region Maps) shown below:

(Continued)

Schedule DM

MULTIFAMILY ACCOMMODATION - RESIDENTIAL HOTEL - QUALIFYING RV PARK
(Continued)

SPECIAL CONDITIONS (Continued)

8. Baseline Allocations: (Continued)

Summer Season * Baseline Region	kWh Per Day Basic Allocation	All-Electric Allocation
10	4.8	5.4
13	6.6	12.2
14	6.6	10.1
15	22.8	22.8
16	7.1	11.4
17	6.3	8.9

Winter Season ** Baseline Region	kWh Per Day Basic Allocation	All-Electric Allocation
10	5.1	10.1
13	5.3	17.4
14	6.2	18.5
15	6.0	17.2
16	7.5	22.4
17	5.9	14.1

* Summer Season shown above for Baseline Regions 10, 13, 14, 16, and 17 is May 1, through October 31. Summer Season shown above for Baseline Region 15 is June 1, through September 30.

** Winter Season shown above for Baseline Regions 10, 13, 14, 16, and 17 is November 1, through April 30. Winter Season shown above for Baseline Region 15 is October 1, through May 31.

9. An Eligibility Declaration may be required for service under this rate schedule.

10. Resale and Submetering. Submetering for the purpose of resale of electricity is not allowed under this rate schedule. Electricity received from the Company may be provided to tenants as part of the rental charge, but may not be itemized separately, and rents shall not vary based on electrical consumption.

Schedule DMS-1 Sheet 1 of 3

DOMESTIC SERVICE
MULTIFAMILY ACCOMMODATION
SUBMETERED

APPLICABILITY

Applicable to domestic service including lighting, heating, cooking, and power use or combination thereof in a multifamily accommodation on a single premises where all of the single family accommodations are separately submetered. Closed to new installations as of December 7, 1981.

TERRITORY

Within the entire territory served.

RATES

The rate of the single-family domestic rate schedule, Schedule D, shall be adjusted as follows:

Energy Charge:

The baseline quantity to be billed under rates designated as applicable to Baseline Service shall be determined by multiplying the applicable baseline quantities set forth in Preliminary Statement, Part H, Baseline Service, by the appropriate number of submetered single-family accommodations.

If any submetered single-family accommodation qualifies for CARE rate assistance as set forth in Schedule D-CARE, the Baseline quantity shall be prorated among the applicable CARE Baseline rate and the regular Baseline rate according to the proportion of qualifying and nonqualifying accommodations. Nonbaseline usage, if applicable, shall be prorated among the applicable CARE Nonbaseline rate and the regular Nonbaseline rate according to the same proportion as the Baseline quantity.

DMS-1 Discount:

The discount provided under this schedule shall not apply to Adjustment Charges. The total daily DMS-1 Discount to Base Rate charges is \$0.06 (I) per day per single-family accommodation. This is the amount of the submetering discount of \$0.08 per day per single-family accommodation (I) reduced by a diversity factor of \$0.02 per day for each such (I) accommodation.

In no event shall the total daily DMS-1 discount of \$0.06 per single (I) family accommodation exceed the Base Rate Energy Charge which would have resulted under the Domestic Schedule calculated at a daily Annualized Base Rate of \$0.08148 per kWh. Also, the daily Minimum Charge shall apply.

(Continued)

Schedule DMS-1
DOMESTIC SERVICE
MULTIFAMILY ACCOMMODATION
SUBMETERED
(Continued)

Sheet 2 of 3

Minimum Charge:

The Minimum Charge shall be the same as set forth in Schedule D.

Minimum Average Rate:

A Minimum Average Rate of $0.04856 per kWh shall apply where the Minimum Average Rate exceeds the average cents per kWh of a master-metered customer's total electric bill (including CARE Surcharge and PUC Reimbursement Fee, but excluding local surcharges such as Franchise Fees and City Taxes). The higher of the bills calculated under the Minimum Average Rate, or the otherwise applicable rate is then reduced by the applicable Domestic CARE discount.

SPECIAL CONDITIONS

1. Seasonal Service: For multifamily accommodation customers who normally require service for only part of the year, service under this schedule may be applicable only on annual contract.

2. Notification: It is the responsibility of the customer to advise the Company within 15 days following any change in the number of submetered single-family accommodations and any change in qualifications for baseline allocations.

3. Miscellaneous Loads: Miscellaneous electrical loads on the same meter such as general lighting, laundry rooms, multifamily accommodation office, general maintenance, and other similar usage incidental to the operation of a multifamily accommodation will be considered as domestic usage.

4. Nondomestic Enterprises: Electric energy used for nondomestic enterprises such as offices (other than an office used only for the multifamily accommodation), stores, shops, restaurants, service stations, and other similar establishments will be separately metered and billed under applicable schedules.

5. An Eligibility Declaration may be required for service under this rate schedule

6. CARE Rate Assistance:

a. Customers receiving service under this schedule shall comply with the provisions of Public Utilities Code Section 739.5 in providing service to their submetered tenants. This includes, among other things, providing electric service to CARE tenants under the provisions of Schedule D-CARE of Edison's tariffs. (T)

(Continued)

(To be inserted by utility)	Issued by	(To be inserted by Cal. PUC)
Advice	John Fielder	Date Filed
Decision		Effective
OEAN17.12	Vice-President	Resolution

Sheet 3 of 3

Schedule DMS-1
DOMESTIC SERVICE
MULTIFAMILY ACCOMMODATION
SUBMETERED

(Continued)

SPECIAL CONDITIONS

6. CARE Rate Assistance: (Continued)

b. Customers served under this schedule shall provide application and declaration forms for the CARE rate to their submetered residential tenants. The completed application forms of eligible CARE tenants shall be mailed by the tenant to Edison.

c. When the Company receives an application from a qualifying low CARE tenant, the information will be forwarded to the Company's customer receiving service under this schedule.

d. The proration of the DMS-1 customer's bill by the Company under the provisions of the Energy Charge shall commence no later than one billing period after receipt and approval by the Company of a qualifying tenant's application.

e. It is the responsibility of the DMS-1 customer to notify the Company immediately of the date each CARE tenant is no longer receiving service from the DMS-1 customer. In addition, if the DMS-1 customer has good reason to suspect that a tenant is not eligible, the DMS-1 customer should notify the Company.

7. Failure of a DMS-1 customer to abide by the Company's tariffs may result in rebilling or discontinuance of service in accordance with the Company's tariffs. The DMS-1 customer's account may also be rebilled consistent with Rule 17.

8. Condition for Receiving Submeter Rate Discount: The submetering discount provided herein prohibits further recovery by mobile home park owners for the costs of owning, operating, and maintaining their electric submetered system. This prohibition also includes the cost of the replacement of the electric submetered system.

This language was authorized by Ordering Paragraph 4 of Decision 95-02-090, dated February 22, 1995.

Schedule DMS-2
DOMESTIC SERVICE
MOBILEHOME PARK MULTIFAMILY ACCOMMODATION
SUBMETERED

APPLICABILITY

Applicable to domestic service including lighting, heating, cooking, and power use or combination thereof in a mobilehome park multifamily accommodation on a single premises where all of the single-family mobilehome accommodations are separately submetered.

TERRITORY

Within the entire territory served.

RATES

The rate of the single-family domestic rate schedule, Schedule D, shall be adjusted as follows:

Energy Charge:

The baseline quantity to be billed under rates designated as applicable to Baseline Service shall be determined by multiplying the applicable baseline quantities set forth in the Preliminary Statement, Part H, Baseline Service, by the appropriate number of submetered single-family mobilehome accommodations.

If any submetered single-family accommodation qualifies for CARE rate assistance as set forth in Schedule D-CARE, the Baseline quantity shall be prorated among the applicable CARE Baseline rate and the regular Baseline rate according to the proportion of qualifying and nonqualifying accommodations. Nonbaseline usage, if applicable, shall be prorated among the applicable CARE Nonbaseline rate and the regular Nonbaseline rate according to the same proportion as the Baseline quantity.

DMS-2 Discount:

The discount provided under this schedule shall not apply to Adjustment Charges. The total daily DMS-2 Discount to Base Rate Energy Charges is \$0.27 per single-family mobilehome accommodation. This is the amount (I) of the submetering discount of \$0.28 per day per single-family (I) mobilehome accommodation reduced by a diversity factor of \$0.01 per day (R) for each such accommodation.

In no event shall the total daily DMS-2 discount of \$0.27 per single (I) family mobilehome accommodation exceed the Base Rate Energy Charge which would have resulted under the Domestic Schedule calculated at a daily Annualized Base Rate of \$0.08148 per kWh. Also, the daily Minimum Charge shall apply.

Minimum Charge:

The Minimum Charge shall be the same as set forth in Schedule D.

(Continued)

Schedule DMS-2 Sheet 2 of 3

DOMESTIC SERVICE
MOBILEHOME PARK MULTIFAMILY ACCOMMODATION
SUBMETERED

(Continued)

RATES (Continued)

Minimum Average Rate:

A Minimum Average Rate of $0.04856 per kWh shall apply where the Minimum Average Rate exceeds the average cents per kWh of a master-metered customer's total electric bill (including CARE Surcharge and PUC Reimbursement Fee, but excluding local surcharges such as Franchise Fees and City Taxes). The higher of the bills calculated under the Minimum Average Rate or the otherwise applicable rate is then reduced by the applicable Domestic CARE discount.

SPECIAL CONDITIONS

1. Seasonal Service: For mobilehome park multifamily accommodation customers who normally require service for only part of the year, service under this schedule may be applicable only on annual contract.

2. Notification: It is the responsibility of the customer to advise the Company within 15 calendar days following any change in the number of submetered mobilehome single-family accommodations and any change in qualifications for baseline allocations.

3. Miscellaneous Loads: Miscellaneous electrical loads on the same meter such as general lighting, laundry rooms, mobilehome park office, general maintenance, and other similar usage incidental to the operation of a mobilehome park multifamily accommodation will be considered as domestic usage.

4. Nondomestic Enterprises: Electric energy used for nondomestic enterprises such as offices (other than an office used only for the mobilehome park), stores, shops, restaurants, service stations, and other similar establishments will be separately metered and billed under applicable schedules.

5. An Eligibility Declaration may be required for service under this rate schedule.

(Continued)

Schedule DMS-2
DOMESTIC SERVICE
MOBILEHOME PARK MULTIFAMILY ACCOMMODATION
SUBMETERED
(Continued)

SPECIAL CONDITIONS (Continued)

6. CARE Rate Assistance:

a. Customers receiving service under this schedule shall comply with the provisions of Public Utilities Code Section 739.5 in providing service to their submetered tenants. This includes, among other things, providing electric service to CARE tenants under the provisions of Schedule D-CARE of Edison's tariffs.

b. Customers served under this schedule shall provide application and declaration forms for the CARE rate to their submetered residential tenants. The completed application forms of eligible CARE tenants shall be mailed by the tenant to Edison.

c. When the Company receives an application from a qualifying CARE submetered tenant, the information will be forwarded to the Company's customer receiving service under this schedule.

d. The proration of the DMS-2 customer's bill by the Company under the provisions of the Energy Charge shall commence no later than one billing period after receipt and approval by the Company of a qualifying tenant's application.

e. It is the responsibility of the DMS-2 customer to notify the Company immediately of the date each CARE tenant is no longer receiving service from the DMS-2 customer. In addition, if the DMS-2 customer has good reason to suspect that a tenant is not eligible, the DMS-2 customer shall notify the Company.

7. Failure of a DMS-2 customer to abide by the Company's tariffs may result in rebilling or discontinuance of service in accordance with the Company's tariffs. The DMS-2 customer's account may also be rebilled consistent with Rule 17.

8. Condition for Receiving Submeter Rate Discount: The submetering discount provided herein prohibits further recovery by mobile home park owners for the costs of owning, operating, and maintaining their electric submetered system. This prohibition also includes the cost of the replacement of the electric submetered system.

This language was authorized by Ordering Paragraph 4 of Decision 95-02-090, dated February 22, 1995.

Schedule DMS-3 Sheet 1 of 4 (T)

DOMESTIC SERVICE
QUALIFYING RV PARK ACCOMMODATION
SUBMETERED

APPLICABILITY

This rate is applicable to domestic service including lighting, heating, cooking, and power use or combination thereof in a Qualifying RV Park where all the RV spaces of the park, or all of the RV spaces in a specific section of the park, are separately submetered and reserved for prepaid month-to-month tenants.

TERRITORY

Within the entire territory served.

RATES

The rate of the single-family domestic rate schedule, Schedule D, shall be adjusted as follows:

Energy Charge:

The baseline quantity to be billed under rates designated as applicable to Baseline Service shall be determined by multiplying the applicable baseline quantities set forth in Special Condition No. 8, by the occupied number of submetered long term RV spaces. (C)

If any tenant in a submetered Qualifying RV Park qualifies for CARE rate assistance as set forth in Schedule D-CARE, the Baseline quantity shall be prorated among the applicable CARE Baseline rate and the regular Baseline rate according to the proportion of qualifying and nonqualifying spaces. Nonbaseline usage, if applicable, shall be prorated among the applicable CARE Nonbaseline rate and the regular Nonbaseline rate according to the same proportion as the Baseline quantity.

DMS-3 Submetering Discount:

The submetering discount is zero.

Minimum Charge:

The Minimum Charge shall be the same as set forth in Schedule D.

(Continued)

Schedule DMS-3 Sheet 2 of 4 (T)

DOMESTIC SERVICE
QUALIFYING RV PARK ACCOMMODATION
SUBMETERED

SPECIAL CONDITIONS

1. Notification: It is the responsibility of the customer to advise the Company within 15 days following any change in the number of submetered RV accommodations and any change in qualifications for baseline allocations.

2. Miscellaneous Loads: Miscellaneous electrical loads on the same meter such as general lighting, laundry rooms, Qualifying RV Park office, general maintenance, and other similar usage incidental to the operation of a Qualifying RV Park will be considered as domestic usage.

3. Nondomestic Enterprises: Electric energy used for nondomestic enterprises such as offices (other than an office used only for the Qualifying RV Park accommodation), stores, shops, restaurants, service stations, and other similar establishments will be separately metered and billed under applicable schedules.

4. Qualifying RV Park: An RV park, or portion of an RV park, where all of the spaces on the same master meter are occupied by a tenant in a RV used as a residence and renting on a prepaid month-to-month basis. The master meter shall not include nondomestic enterprises as described in Special Condition No. 3.

5. An Eligibility Declaration and/or on-site verification of books, records, and facilities may be required for service under this rate schedule. If the Company's on-site inspector requires a park operator's assistance, the Company shall provide reasonable advance notice of the verification visit.

6. CARE Rate Assistance:

   a. Customers receiving service under this schedule shall comply with the provisions of Public Utilities Code Section 739.5 in providing service to their submetered tenants. This includes, among other things, providing electric service to CARE tenants under the provisions of Schedule D-CARE of Edison's tariffs.

   b. Customers served under this schedule shall provide application and declaration forms for the CARE rate to their submetered residential tenants. The completed application forms of eligible CARE tenants shall be mailed by the tenant to Edison.

(Continued)

Schedule DMS-3 Sheet 3 of 4 (T)
DOMESTIC SERVICE
QUALIFYING RV PARK ACCOMMODATION
SUBMETERED

SPECIAL CONDITIONS (Continued)

6. CARE Rate Assistance: (Continued)

c. When the Company receives an application from a qualifying CARE submetered tenant, the information will be forwarded to the Company's customer receiving service under this schedule.

d. The proration of the DMS-3 customer's bill by the Company under the provisions of the Energy Charge shall commence no later than one billing period after receipt and approval by the Company of a qualifying tenant's application.

e. It is the responsibility of the DMS-3 customer to notify the Company immediately of the date each CARE tenant is no longer receiving service from the DMS-3 customer. In addition, if the DMS-3 customer has good reason to suspect that a tenant is not eligible, the DMS-3 customer should notify the Company.

7. Failure of a DMS-3 customer to abide by the Company's tariffs may result in a change of rate, rebilling and/or discontinuance of service in accordance with the Company's tariffs. The DMS-3 customer's account may also be rebilled consistent with Rule 17.

8. Baseline Allocations: The applicable baseline quantity of electricity to be billed under rates designated as applicable to Baseline Service shall be the total of any Medical Baseline Allocation permitted under Preliminary Statement, Part H, Paragraph 4, plus the applicable daily baseline quantities for the customer's Baseline Region (as described on the Baseline Region Maps and in the boundary descriptions which are in conjunction with such Baseline Region Maps) shown below: (N)

Summer Season *	kWh Per Day	
Baseline Region	Basic Allocation	All-Electric Allocation
10	4.8	5.4
13	6.6	12.2
14	6.6	10.1
15	22.8	22.8
16	7.1	11.4
17	6.3	8.9

(Continued)

Schedule DMS-3 Sheet 4 of 4
DOMESTIC SERVICE
QUALIFYING RV PARK ACCOMMODATION
SUBMETERED

Baseline Allocations: (Continued)

Winter Season ** Baseline Region	kWh Per Day Basic Allocation	All-Electric Allocation
10	5.1	10.1
13	5.3	17.4
14	6.2	18.5
15	6.0	17.2
16	7.5	22.4
17	5.9	14.1

* Summer Season shown above for Baseline Regions 10, 13, 14, 16, and 17 is May 1, through October 31. Summer Season shown above for Baseline Region 15 is June 1, through September 30.

** Winter Season shown above for Baseline Regions 10, 13, 14, 16, and 17 is November 1, through April 30. Winter Season shown above for Baseline Region 15 is October 1, through May 31.

(END OF APPENDIX C)