

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



FILED

01-11-10
04:59 PM

Order Instituting Rulemaking to Address the Gas Utilities' Incentive Mechanisms and the Treatment of Hedging Under Those Incentive Mechanisms.

R. 08-06-025
Filed June 26, 2008

**COMMENTS OF LODI GAS STORAGE, L.L.C.
ON PROPOSED DECISION**

Peter G. Esposito
CRESTED BUTTE CATALYSTS LLC
P.O. Box 668
Crested Butte, Colorado 81224
Telephone: (970) 349-2080
Fax: (970) 349-2083
E-Mail: peteresposito@earthlink.net

Dan L. Carroll
DOWNEY BRAND LLP
621 Capitol Mall, 18th Floor
Sacramento, California 95814
Telephone: (916) 444-1000
Fax: (916) 444-2100
E-mail: dcarroll@downeybrand.com

Attorneys for Lodi Gas Storage, L.L.C.

January 11, 2010

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

Order Instituting Rulemaking to Address the Gas Utilities' Incentive Mechanisms and the Treatment of Hedging Under Those Incentive Mechanisms.

R. 08-06-025
Filed June 26, 2008

**COMMENTS OF LODI GAS STORAGE, L.L.C.
ON PROPOSED DECISION**

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, Lodi Gas Storage, L.L.C. (LGS) files these brief Comments requesting a correction in the Proposed Decision of Administrative Law Judge Pulsifer (PD) issued in this proceeding on December 22, 2009.

LGS is an Independent Storage Provider which owns and operates gas storage projects in Northern California pursuant to a Certificate of Public Convenience and Necessity issued by the Commission. At the bottom of page 4, the PD inaccurately states that LGS participated in this proceeding "representing competing gas marketers." LGS respectfully requests that the final decision be revised to remove all references to LGS in paragraph number 4 on page 4, and to insert a new paragraph 5 that states: "LGS as a competing Independent Gas Storage Provider."

LGS appreciates the opportunity to provide these brief Comments.

Dated: January 11, 2010

Respectfully Submitted,

/s/
Dan L. Carroll
Downey Brand LLP
Attorneys for Lodi Gas Storage, L.L.C.

Peter G. Esposito
Crested Butte Catalysts LLC

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the of **COMMENTS OF LODI GAS STORAGE, L.L.C. ON PROPOSED DECISION** on January 11, 2010, on the persons shown below. Service was made by electronic mail to those whose electronic mail addresses are available and via U.S. mail to those for whom electronic mail addresses were not known. This service list was compiled from the service list appearing on the docket page for this proceeding on the website of the California Public Utilities Commission.

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

Dated this 11th day of January, 2010 at Sacramento, California.

_____/ s /_____
Cassandra J. Baines

SERVICE LIST

ELECTRONIC SERVICE:

keith.mccrea@sablaw.com; roger@berlinerlawpllc.com; jimross@r-c-s-inc.com;
douglas.w.rasch@exxonmobil.com; agold@coral-energy.com; wgarrettesi@aol.com;
steve.koerner@el Paso.com; richard.stapler@kernrivergas.com; david.brooks@state.nm.us;
keith.layton@swgas.com; chilen@sppc.com; jellis@sempra.com; lurick@sempra.com;
mthorp@sempra.com; dselmi@aol.com; hchoy@isd.co.la.ca.us; rkeen@manatt.com;
npedersen@hanmor.com; klatt@energyattorney.com; douglass@energyattorney.com;
liddell@energyattorney.com; kwiese@aqmd.gov; douglas.porter@sce.com; gloria.ing@sce.com;
walker.matthews@sce.com; cory@briggslawcorp.com; gbaker@sempra.com;
lbiddle@ferrisbritton.com; wrapp@sempra.com; snelson@sempra.com;
jkloberdanz@semprautilities.com; srahon@semprautilities.com; jleslie@luce.com;
cscolastico@cc.sbcounty.gov; tam.hunt@gmail.com; ek@a-klaw.com;
mdjoseph@adamsbroadwell.com; keeth@smwlaw.com; gxh@cpuc.ca.gov;
ljt@cpuc.ca.gov; rxr@cpuc.ca.gov; rmp@cpuc.ca.gov; marcel@turn.org; scarter@nrdc.org;
cjn3@pge.com; j1pc@pge.com; kts1@pge.com; rbm4@pge.com;
jwmctarnaghan@duanemorris.com; epoole@adplaw.com; bcragg@gmssr.com;
jarmstrong@gmssr.com; mfogelman@reedsmith.com; mday@goodinmacbride.com;
dhuard@manatt.com; jkarpp@winston.com; kck5@pge.com; raveen_maan@city.palo-alto.ca.us;
Service@spurr.org; kowalewskia@calpine.com; joe.paul@dynegy.com;
wbooth@booth-law.com; tomb@crossborderenergy.com; tomk@mid.org; jeff@jbsenergy.com;
matt@bradylawus.com; steveng@destrategies.com; creheis@wspa.org;
dcarroll@downeybrand.com; dkk@eslawfirm.com; glw@eslawfirm.com; rob@clfp.com;

scohn@smud.org; mpa@a-klaw.com; pinney@capp.ca; margaret_crossen@transcanada.com; DSchlissel@synapse-energy.com; jscandola@buckeye.com; wschmidt@buckeye.com; jbushee@sablaw.com; jcm@vnf.com; pik@vnf.com; ron.giteck@state.mn.us; kimberly_watson@kindermorgan.com; kirby.bosley@jpmorgan.com; Larry_Jenkins@oxy.com; hobs@bp.com; william.tomlinson@elpaso.com; peteresposito@earthlink.net; kjsimonsen@ems-ca.com; Ned.Greenwood@questar.com; djones2@chw.edu; ed.gieseking@swgas.com; john.olenick@swgas.com; ken.jacobs@swgas.com; valerie.ontiveroz@swgas.com; cfaber@semprautilities.com; HYao@SempraUtilities.com; centralfiles@semprautilities.com; dakinports@semprautilities.com; bmusich@semprautilities.com; robert.pettinato@ladwp.com; nwhang@manatt.com; rzhang@cityofpasadena.net; sendo@ci.pasadena.ca.us; eklinkner@cityofpasadena.net; sendo@ci.pasadena.ca.us; slins@ci.glendale.ca.us; jackmack@suesec.com; bjeider@ci.burbank.ca.us; ffletcher@ci.burbank.ca.us; lparker@ci.burbank.ca.us; rmorillo@ci.burbank.ca.us; mkay@aqmd.gov; case.admin@sce.com; Jairam.gopal@sce.com; Michael.Alexander@sce.com; burkee@cts.com; asullivan@sempra.com; wtobin@sempraglobal.com; mshames@ucan.org; scottanders@sandiego.edu; marcie.milner@shell.com; jmgarber@iid.com; mecampbell@iid.com; ctoca@utility-savings.com; gdehart@anaheim.net; ssciortino@anaheim.net; hoffmang@sbcapcd.org; elaine.duncan@verizon.com; paulfenn@local.org; clarence.binninger@doj.ca.gov; norman.furuta@navy.mil; nsuetake@turn.org; mdm8@pge.com; filings@a-klaw.com; ray.welch@navigantconsulting.com; cpuccases@pge.com; sls@a-klaw.com; saw0@pge.com; WMLb@pge.com; smalllecs@cwclaw.com; smalllecs@cwclaw.com; mmattes@nossaman.com; judypau@dwt.com; salleyoo@dwt.com; cem@newsdata.com; lisaweinzimer@sbcglobal.net; ecrem@ix.netcom.com; AESH@pge.com; regrelcpuccases@pge.com; M1Wr@pge.com; whc9@pge.com; lk11@pge.com; ron.dahlin@ge.com; Ken@rdwd.com; bevin_hong@transcanada.com; editorial@californiaenergycircuit.net; JerryL@abag.ca.gov; ceyap@earthlink.net; mrw@mrwassoc.com; robertg@greenlining.org; samuelk@greenlining.org; rcamacho@ci.santa-clara.ca.us; bmcc@mccarthylaw.com; bmcc@mccarthylaw.com; wgmanuel@tid.org; jweil@aglet.org; rmccann@umich.edu; kenneth.swain@navigantconsulting.com; kdusel@navigantconsulting.com; cpucrulings@navigantconsulting.com; gpickering@navigantconsulting.com; roechsler@navigantconsulting.com; dana.griffith@ncpa.com; cmkehrrein@ems-ca.com; mclaughlin@braunlegal.com; curt.barry@iwpnews.com; kdw@woodruff-expert-services.com; mmueller@energy.state.ca.us; blaising@braunlegal.com; susan.durbin@doj.ca.gov; cabaker906@sbcglobal.net; kmills@cfbf.com; karen@klindh.com; bbrunel@smud.org; sas@a-klaw.com; david_white@transcanada.com; egw@a-klaw.com; leslie_ferron-jones@transcanada.com; wmc@a-klaw.com; loe@cpuc.ca.gov; beg@cpuc.ca.gov; dkf@cpuc.ca.gov; dil@cpuc.ca.gov; cpe@cpuc.ca.gov; hym@cpuc.ca.gov; jnm@cpuc.ca.gov; jsw@cpuc.ca.gov; alf@cpuc.ca.gov; kcl@cpuc.ca.gov; lau@cpuc.ca.gov; zaf@cpuc.ca.gov; nil@cpuc.ca.gov; ram@cpuc.ca.gov; rle@cpuc.ca.gov; skh@cpuc.ca.gov; trp@cpuc.ca.gov; wmp@cpuc.ca.gov; dsimerot@arb.ca.gov; billjulian@sbcglobal.net; edward.randolph@asm.ca.gov; Jim.Campion@conservation.ca.gov; jpacheco@water.ca.gov; jgeorge@water.ca.gov; Sphinney@aspeneq.com;

U.S. MAIL:

Alana Steele, ATTORNEY AT LAW
HANNA AND MORTON, LLP
The Southern California Generation Coalition
444 South Flower Street, Suite 1500
Los Angeles, CA 90071-2916

Enrique Gallardo, Attorney at Law
LATINO ISSUES FORUM
160 Pine Street, Suite 700
San Francisco, CA 94111

Samara Mindel, Regulatory Affairs Analyst
FELLON-MCCORD & ASSOCIATES
9960 Corporate Campus Drive, Suite 2500
Louisville, KY 40223

Gary Hinnners
RRI ENERGY, INC.
RELIANT ENERGY, INC.
Post Office Box 148
Houston, TX 77001-0148

R.E. Green, Regulatory Specialist
CHEVRON PIPE LINE COMPANY
4800 Fournace Place
Bellaire, TX 77401-2324

Elizabeth Douglass, Staff Writer
LOS ANGELES TIMES
202 West First Street
Los Angeles, CA 90012

Dave Smith, Director, Regulatory Affairs Fuels
BP AMERICA, INC.
6 Centerpointe Drive
La Palma, CA 90623

David E. Novitski
THELEN REID BROWN RAYSMAN & STEINER
WOODSIDE NATURAL GAS INC.
101 Second Street, Suite 1800
San Francisco, CA 94105

Melanie L. Gillette
DUKE ENERGY NORTH AMERICA, LLC
980 9th Street, Suite 1420
Sacramento, CA 95814

Tim Nichols
CITY OF REDDING, ELECTRIC DEPARTMENT
Post Office Box 496071
Redding, CA 96049-6071

Gary M. Yee
INDUSTRIAL SECTION
CALIFORNIA AIR RESOURCES BOARD
1001 I Street
Post Office Box 2815
Sacramento, CA 95812