

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



FILED
09-24-10
11:59 AM

Application of Central Valley Gas Storage,)
LLC for a Certificate of Public Convenience) Application 09-08-008
and Necessity for Construction and) (Filed August 19, 2009)
Operation of Natural Gas Storage Facilities)
_____)

**MOTION OF ENERLAND, LLC
FOR LEAVE TO LATE-FILE COMMENTS AND
FOR EXTENSION OF DATE FOR FILING REPLY COMMENTS**

In accordance with Rule 11.1 of the Rules of Practice and Procedure (“Rules”) of the California Public Utilities Commission (“Commission”), Enerland, LLC (“Enerland”) hereby respectfully moves for leave to late-file the attached COMMENTS OF ENERLAND, LLC ON PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE KENNEY (“Comments”) and for a corresponding extension of the date for filing reply comments.

The Proposed Decision of Administrative Law Judge Kenney (“Proposed Decision”) was issued August 31, 2010. Comments on the Proposed Decision were due 20 days thereafter, on September 20. Due to an inadvertent mistake of the undersigned counsel for Enerland in counting days, Enerland’s Comments were submitted for filing on September 21.

Enerland did not become aware of the fact that its comments had been submitted late until receipt on September 23 of the Motion of Central Valley Gas Storage, LLC to Strike Out-Of-Time Comments of Enerland, LLC. Enerland then confirmed that its Comments had not been accepted for filing.

Enerland and its counsel seriously regret and apologize for having failed to meet the deadline for submission of comments on the Proposed Decision. Enerland respectfully observes, however, that the issues and concerns addressed in Enerland’s Comments are substantial and important ones and neither the Commission nor any party will suffer any significant harm due to the late filing of Enerland’s Comments.

The Comments were served on ALJ Kenney and all parties on September 21, just one day late. The next Commission decision meeting is scheduled for October 14, 2010. Acceptance of the Comments for filing as of September 21 or as of the present date, September 24, will not significantly delay the Commission's consideration and action on the Proposed Decision, considering that the next Commission decision meeting still is nearly three weeks away.

Enerland also respectfully requests an extension of the due date for reply comments on the Proposed Decision until the next business day at least five days after the date on which a ruling is issued on the present motion. Enerland has no reason to submit reply comments, but recognizes the need of other parties, including the Applicant, Central Valley Gas Storage, LLC, for adequate time to respond to Enerland's Comments.

Respectfully submitted,

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September 24, 2010

CERTIFICATE OF SERVICE

I, Jeannie Wong, hereby certify that on this date I served by electronic mail and by hand delivery, the foregoing **MOTION OF ENERLAND, LLC FOR LEAVE TO LATE-FILE COMMENTS AND FOR EXTENSION OF DATE FOR FILING REPLY COMMENTS** on the parties in Application 09-08-008, below:

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By hand delivery:

Hon. Timothy Kenney
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue, Room 5021
San Francisco, CA 94102

Executed this 24th day of September, 2010, in San Francisco, California.

/S/ JEANNIE WONG
Jeannie Wong

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A0908008 - CENTRAL VALLEY GAS S
FILER: CENTRAL VALLEY GAS STORAGE, LLC
LAST CHANGED: AUGUST 31, 2010

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