



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

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Application of Southern California Edison Company (U338E) to Require a Customer-Financed Added Facilities Agreement for Replacement Added Facilities to Serve the THUMS Islands Consistent with Decision No. 70659 and Tariff Rule 2.

Application 24-12-001

(Filed December 04, 2024)

**THUMS LONG BEACH COMPANY AND CITY OF LONG BEACH
RESPONSE TO ADMINISTRATIVE LAW JUDGE MOORE'S QUESTION
RE ORGANIZATIONAL STRUCTURE OF THE LONG BEACH UNIT AND
OVERVIEW OF COMMUNICATIONS WITH THE STATE**

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November 25, 2025

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STATE OF CALIFORNIA**

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During the status conference before Administrative Law Judge Theresa Moore on November 17, 2025, Her Honor requested that the City of Long Beach (City) and THUMS Long Beach Company (THUMS) provide additional context regarding the organizational structure of the Long Beach Unit (Unit), as well as background concerning the City’s and THUMS’ communication with State of California (State) counterparts. This response is respectfully submitted pursuant to the Administrative Law Judge’s direction to provide the requested overview of the organizational structure and the roles of the pertinent parties involved in the Unit.

A. Organizational Structure and Contacts

The Unit, which includes the four artificial oil islands, is held in trust for the State by the City pursuant to Chapter 138 of the Statutes of 1964, as amended by Chapter 941 of the Statutes of 1991 (collectively, the Granting Statutes). Under this statutory framework, the City serves as both trustee and oil operator of the Unit. While the City exercises operational authority over the Unit, the State retains regulatory oversight through the California State Lands Commission (SLC). THUMS functions as the agent for the current field contractor, California Resources Long Beach, Inc. (Field Contractor). THUMS is responsible for managing

daily oil production and technical field operations for the benefit of the Unit. The costs and profit share associated with the Unit are generally apportioned among the State, the City, the Field Contractor, and the Townlot Owners, which consist of the various individuals and entities holding mineral interests in the Unit. A summary table follows, identifying these parties, their respective roles, and applicable contact information:

Entity	Role/Description	Contact
State of California	Beneficiary and interest owner in the Long Beach Unit; provides oversight via SLC.	Joseph Fabel, Senior Attorney, State Lands Commission, joseph.fabel@slc.ca.gov
City of Long Beach	Trustee and oil operator; manages general oil operations and subsidence of Unit for State and all interest owners, pursuant to Granting Statutes.	Adam Jacobs, Deputy City Attorney (for Dawn McIntosh, City Attorney), Adam.Jacobs@longbeach.gov
THUMS Long Beach Company	Agent of the oil Field Contractor, California Resources Long Beach, Inc; manages daily operations and technical oil production.	Nora Sheriff, Shareholder, Buchalter, nsheriff@buchalter.com Katherine Tyler, Assistant General Counsel, California Resources Corporation, Kate.Tyler@crc.com
Townlot Owners	Individuals, entities, and organizations with separate mineral interests in the Unit.	N/A

B. City and THUMS' Communication with SLC

The City and THUMS have communicated with the SLC, which provides regulatory oversight of the Unit, regarding this matter through both formal and informal channels. Formally, the City has described this matter in its Five-Year Program Plan, which the City is statutorily required to submit to the SLC for approval. Informally, the City and THUMS have

engaged in communications with the SLC concerning the State's potential involvement in this matter. The State, acting through the SLC, has declined direct participation in this matter, and has deferred to the City in its capacity as trustee. This approach reflects the historical relationship among the parties and comports with the authority vested in the City by the State under the Granting Statutes.

The City and THUMS will continue to keep the SLC apprised of this matter as the parties work toward a resolution consistent with the City's role as trustee. Should Your Honor require any further information or clarification regarding the organizational structure or the roles of the parties involved, please do not hesitate to contact the undersigned.

Respectfully submitted,

BUCHALTER, A Professional Corporation

By:



Nora Sheriff
Counsel for Counsel for THUMS Long Beach
Company

CITY OF LONG BEACH



By:
Adam Jacobs, Deputy City Attorney,
on behalf of Dawn McIntosh, City Attorney

November 25, 2025