



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

**FILED**

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Pacific Gas and Electric Company's Application  
for Approval of its 2027 Gas Cost Allocation  
and Rate Design Proposals for its Gas  
Distribution, Transmission and Storage System.

A.25-11-006

(U 39 G)

**RESPONSE OF CENTRAL VALLEY GAS STORAGE, LLC  
TO PACIFIC GAS AND ELECTRIC COMPANY'S 2027 GAS COST  
ALLOCATION AND RATE DESIGN APPLICATION**

Jennifer Garlock  
Sheppard Mullin Richter & Hampton LLP  
350 South Grand Avenue, 40th Floor  
Los Angeles, California 90071  
Telephone: (213) 620-5570  
Email: jgarlock@sheppardmullin.com

*Attorneys for Central Valley Gas Storage, LLC*

December 22, 2025

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**I. INTRODUCTION**

In accordance with Rule 2.6 of the Rules of Practice and Procedure ("Rules") of the California Public Utilities Commission ("Commission"), Central Valley Gas Storage, LLC ("CVGS") submits this response to Pacific Gas and Electric Company's ("PG&E") Application for Approval of its 2027 Gas Cost Allocation and Rate Design Proposals for its Gas Distribution, Transmission and Storage System, filed November 21, 2025 ("Application"). Notice of the Application's filing was published in the Commission's Daily Calendar on November 25, 2025, and pursuant to Rule 2.6(a), responses are due within thirty (30) days of such date. Therefore, this response is timely filed.

Rule 1.4 states that a person may become a party to a proceeding by, *inter alia*, filing a response to an application. By filing this response CVGS seeks party status in this proceeding.

**II. DESCRIPTION OF CVGS**

CVGS provides natural gas storage services to the California marketplace. The CVGS storage facility is located near the unincorporated town of Princeton in Colusa County and is connected to PG&E's transmission system via a 14.7-mile pipeline. This facility is certificated

by the Commission to provide for storage of 11 Bcf of working gas, with a maximum firm deliverability of 300 MMcf/d and a maximum firm injection capability of 300 MMcf/d. CVGS offers storage services to customers on PG&E's system. Accordingly, CVGS has a direct interest in the issues to be decided in this proceeding.

### **III. INTEREST IN THIS PROCEEDING**

PG&E's Application contains proposed rates and terms for gas transportation and storage services that will impact the market for such storage services, which could have a significant impact on CVGS's business. CVGS intends to participate in this proceeding to further explore PG&E's proposals, determine their impact on CVGS, and ultimately either reach a satisfactory resolution of any problems created by PG&E's proposals, or present alternative measures to meet the gas transportation and storage requirements of PG&E's customers.

### **IV. SERVICE**

For purposes of receipt of all correspondence, pleadings, orders, and notices in this proceeding, the following representatives should be placed on the service list:

Central Valley Gas Storage, LLC:

Jennifer Garlock  
Sheppard Mullin Richter & Hampton LLP  
350 South Grand Avenue, 40th Floor  
Los Angeles, California 90071  
Telephone: (213) 620-5570  
Email: jgarlock@sheppardmullin.com

With copies to:

Amy Johnson  
Director of Regulatory  
Caliche Development Partners III, LLC  
919 Milam Street, Suite 2425  
Houston, TX 77002  
Telephone: (713) 494-7816  
Email: ajohnson@calichestorage.com

## **V. RULE 2.6 REQUIREMENTS**

In accordance with Rule 2.6(d), CVGS states the following:

1. CVGS does not object to the proposed categorization of this proceeding as ratesetting.
2. CVGS agrees with PG&E that evidentiary hearings will be required.
3. CVGS does not object to PG&E's identification of the issues to be considered in this proceeding. However, CVGS is still evaluating the Application and therefore reserves the right to identify additional issues that should be addressed in this proceeding.
4. CVGS does not object to PG&E's proposed schedule.

## **VI. CONCLUSION**

CVGS appreciates the opportunity to provide this response to the Application. As reflected herein, CVGS does not object to the Application at this time.

December 22, 2025

Respectfully submitted,

By: /s/ Jennifer Garlock

Jennifer Garlock  
Sheppard Mullin Richter & Hampton LLP  
350 South Grand Avenue, 40th Floor  
Los Angeles, California 90071  
Telephone: (213) 620-5570  
Email: jgarlock@sheppardmullin.com

*Attorneys for Central Valley Gas Storage, LLC*