



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

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Application of Pacific Gas and Electric Company
(U39G) for Approval of its 2027 Gas Cost
Allocation and Rate Design Proposals for its Gas
Distribution, Transmission and Storage System.

A. 25-11-006
(Filed November 21, 2025)

**JOINT RESPONSE OF MOSS LANDING POWER COMPANY LLC AND NATGAS
GREENLEAF HOLDINGS, LLC**

DOWNEY BRAND, LLP
Brian T. Cragg
Christopher Marelich
455 Market Street, Suite 1500
San Francisco, California 94105
Email: bcragg@downeybrand.com
Telephone: (415) 848-4808
Facsimile: (415) 848-4801

Attorneys for Moss Landing Power Company
LLC and NatGas Greenleaf Holdings, LLC

Dated: January 7, 2026

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**JOINT RESPONSE OF MOSS LANDING POWER COMPANY LLC AND NATGAS
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In accordance with Rule 2.6 of the Commission’s Rules of Practice and Procedure, Moss Landing Power Company LLC and NatGas Greenleaf Holdings, LLC submit this joint response to the application of Pacific Gas and Electric Company (PG&E) for approval of its 2027 cost allocation and rate design proposals for its gas distribution, transmission, and storage system. The December 9, 2025, ruling of Administrative Law Judge Carolyn Sisto authorized filing of protests and responses by January 7, 2026, later than the 30 days prescribed in Rule 2.6(a).

Rule 1.4(a)(2) provides that a person may become a party to a proceeding by filing a response to an application. By filing this response, Moss Landing Power Company LLC and NatGas Greenleaf Holdings, LLC will become parties to this proceeding.

**I. DESCRIPTION OF MOSS LANDING POWER COMPANY LLC AND NATGAS
GREENLEAF HOLDINGS, LLC**

Moss Landing Power Company LLC (Moss Landing) is the owner of the Moss Landing Power Plant, which consists of Units 1 and 2, gas-fired combined cycle units that were completed in 2002, with a combined capacity of 1020 megawatts (MW). Moss Landing is one of

the largest customers of PG&E's gas transportation services and will be directly affected by the outcome of this proceeding.

NatGas Greenleaf Holdings, LLC is the owner of the Greenleaf 2 Power Plant (Greenleaf), a 49.5 MW gas-fired generation facility located in Yuba City. As a gas transportation customer of PG&E, Greenleaf will be directly affected by the outcome of this proceeding.

Moss Landing and Greenleaf are indirect wholly owned subsidiaries of Vistra Corp. (Vistra), a leading, Fortune 500 integrated retail electricity and power generation company based in Irving, Texas. Vistra brings its products and services to market in 20 states and the District of Columbia, including six of the seven competitive wholesale markets in the U.S. Vistra is one of the largest competitive power generators in the U.S. with a capacity of approximately 44,000 MW powered by a diverse portfolio, including natural gas, nuclear, solar, and battery energy storage facilities. In addition to the Moss Landing and Greenleaf power plants, in California Vistra's subsidiaries also operate the Moss Landing Energy Storage Facility (450 MW / 1,800 MWh) and the Oakland Power Plant (110 MW), which provide energy, capacity, and ancillary services to support California's goal of having safe, reliable, and cost-effective electricity supply. Vistra is in the process of bringing online the Deer Creek Solar & Storage Facility, which will provide 50 MW when commercial operations begin in mid-2026.

II. INTEREST IN THIS PROCEEDING

Moss Landing and Greenleaf are currently analyzing PG&E's application and testimony. At this preliminary stage, Moss Landing and Greenleaf believe that they will be particularly affected by the potential resolution of the allocation of local transmission costs between core and noncore customers and PG&E's Local Transmission Study, PG&E's forecasts of electric generation throughput, the allocation of costs resulting from PG&E's Inventory

Management Study, and PG&E's proposal not to offer a fixed/variable option as a standard rate design.

III. SERVICE

Moss Landing and Greenleaf will participate in this proceeding through its representative, whose information is as follows:

Brian T. Cragg
Downey Brand, LLP
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: (415) 848-4808
Facsimile: (415) 848-4801
Email: bcragg@downeybrand.com

IV. RULE 2.6(d) REQUIREMENTS

As required by Rule 2.6(d), Moss Landing and Greenleaf state that (1) they do not object to PG&E's proposed categorization of this proceeding as ratesetting; (2) they agree with PG&E that evidentiary hearings are likely to be required; (3) they do not object to PG&E's preliminary identification of the issues to be decided in this proceeding, with the understanding that additional issues may arise as Moss Landing, Greenleaf, and other parties continue their analysis of this application; and (4) Moss Landing and Greenleaf do not object to PG&E's proposed schedule.

V. CONCLUSION

Moss Landing and Greenleaf appreciate the Commission's consideration of this response and respectfully ask the Commission to accept Moss Landing Power Company LLC and NatGas Greenleaf Holdings, LLC as parties to this proceeding.

Respectfully submitted this 7th day of January, 2026, at San Francisco, California.

DOWNEY BRAND LLP
Brian T. Cragg
Christopher Marelich
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: (415) 848-4800
Email: bcragg@DowneyBrand.com

By /s/ Brian T. Cragg

Brian T. Cragg

Attorneys for Moss Landing Power Company
LLC and NatGas Greenleaf Holdings, LLC