



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

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A2504004

Application of PACIFIC GAS AND
ELECTRIC COMPANY (U 39 E) for a
Certificate of Public Convenience and
Necessity Authorizing the Construction of the
S-238 Hinkley Compressor Station Electrical
Upgrades Project.

Application No. 25-04-004
(Filed April 9, 2025)

(U 39 E)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
MOTION TO WITHDRAW APPLICATION NO. 25-04-004**

DAVID T. KRASKA
DARRIN GAMBELIN

Law Department
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612
Telephone: (650) 203-3177
E-Mail: darrin.gambelin@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: February 4, 2026

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

Application of PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) for a Certificate of Public Convenience and Necessity Authorizing the Construction of the S-238 Hinkley Compressor Station Electrical Upgrades Project.

(U 39 E)

Application No. 25-04-004
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MOTION TO WITHDRAW APPLICATION NO. 25-04-004**

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (“CPUC” or “Commission”) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) respectfully submits this Motion to Withdraw Application No. 25-04-004 for a Certificate of Public Convenience and Necessity (“CPCN”) for the S-238 Hinkley Compressor Station Electrical Upgrades Project (“Project”). Due to recent component failures and ongoing obsolescence issues impacting PG&E’s ability to make repairs, as further detailed in the attached Tier 1 Advice Letter, the entirety of the Project has commenced under the General Order (“GO”) 177 exemption for emergency projects and is exempt from the requirement to obtain a CPCN. This Motion should be granted because it is timely, reasonable and in the public interest.

I. BACKGROUND

On April 9, 2025, PG&E submitted an application (Application No. 25-04-004) with the Commission for a CPCN to replace the Hinkley Compressor Station’s (“Station”) electrical distribution equipment, which has reached the end of its useful life and requires upgrades for safety, reliability, and maintainability. The Station is located on PG&E’s backbone gas transmission lines 300A and 300B, also known as PG&E’s “Baja Path”, and helps perform the critical function of providing sufficient pressure to transport interstate gas supplies received on the Baja Path to Central and Northern California.

On November 24, 2025, the Assigned Commissioner’s Scoping Memo and Ruling was issued, setting the proposed schedule for the CPCN proceeding. A Commission decision regarding the CPCN is expected in Quarter 3 or 4 of 2026.

On January 20, 2026, due to electrical equipment failures and ongoing obsolescence issues, PG&E commenced the Project to prevent an emergency, including Station outages that could result in loss of gas supply to customers. If the Station is not operational, the PG&E gas system may not have enough capacity to meet demand. This may result in Emergency Flow Orders and curtailments may be necessary to maintain system integrity. In accordance with GO 177, projects necessary to prevent an emergency, including those that could impact safe and reliable gas supply, are exempt from the requirement to obtain a CPCN.^{1/}

On February 4, 2026, PG&E provided notice of its decision to proceed under the GO 177 exemption for emergency projects with the submittal of a Tier 1, information-only, Advice Letter to the Commission. PG&E is in the process of providing Notices of Exemption to all required parties.^{2/} The Tier 1 Advice Letter and Notice of Exemption are attached as Exhibit A.

II. THE MOTION TO WITHDRAW SHOULD BE GRANTED AS THE REQUEST IS TIMELY, REASONABLE, AND IN THE PUBLIC INTEREST

Due to circumstances beyond PG&E’s control, the Project is now exempt from the requirement to obtain a CPCN, eliminating the purpose of the Application and this proceeding. In addition, this proceeding is in its early stages, prior to issuance of a proposed decision, and the issues that would be determined are limited to the details of the Project and would not impact other proceedings. Intervenors in this proceeding will be able to litigate issues regarding the cost of the Project and cost recovery in future ratemaking proceedings.^{3/}

^{1/} GO 177 Section IV.B.c.

^{2/} GO 177 Section V.C.

^{3/} Including PG&E’s 2027 and 2031 General Rate Case Proceedings.

The Commission has found that an applicant may withdraw an application, as a matter of right, when the proceeding is in its early stages.^{4/} While not setting a clear deadline when the applicant can no longer withdraw an application as a matter of right, the Commission has found that it has discretion to rule on application withdrawals in advanced stages of the proceeding where the matter has been submitted upon evidentiary record and a proposed decision has been issued – neither of which has occurred here.^{5/} The Commission has found that “when proceedings have been limited to an exchange of pleadings and the reason an applicant seeks to withdraw a petition for modification are a change in external conditions beyond its control ... no good reason appears to refuse leave to withdraw the petition.”^{6/} In cases where the CPUC has found that an applicant could no longer withdraw its application as a matter of right, motions to withdraw have been granted where reasonable and within the public interest.^{7/}

Here, the proceeding is in the early stages, limited to an exchange of pleadings and well before a proposed decision would be issued. Thus, the Commission should find that PG&E may withdraw the Application as a matter of right.

Even if the Commission finds that granting an application withdrawal is within its discretion, rather than as a matter of right, there is no reason to deny this motion and maintain the proceeding. The entirety of the Project is proceeding under an emergency exemption that does not require Commission approval. Thus, the purpose of this proceeding, consideration of whether the Project should be authorized through issuance of a CPCN, is no longer at issue because the Project is already authorized pursuant to the emergency exemption at Section IV.B.c. of GO 177. Further, the circumstances that led PG&E to commence the Project under the emergency exemption, equipment failures, are beyond its control.

^{4/} D.10-11-005 at 4.

^{5/} D.10-11-005 at 4.

^{6/} D.98-02-013

^{7/} D.25-11-004 at 8.

Granting this motion is within the public interest as there are no greater policy issues or other public interests which may necessitate continuing this proceeding. The issues outlined for this proceeding in the Scoping Memo are unique to this Project. Any ruling regarding these issues, including whether the project serves a present or future public convenience and necessity, would only be applicable to this project and do not involve any broader-ranging policy considerations.

In addition, issues regarding cost and cost recovery for the Project can be best addressed in future proceedings. The Scoping Memo lists four issues related to the cost, including whether PG&E has already received Commission authorization to recover costs for the Project; whether PG&E is requesting in any other proceeding cost recovery authorization for the Project; whether the Project cost estimate is reasonable overall; and whether the Commission should set a cost cap or provide any other cost recovery direction for the Project.

PG&E did not request cost recovery in its CPCN application for this proceeding. Cost recovery for the Project is within the scope of PG&E's rate case proceedings such as the 2023 General Rate Case ("GRC"), the 2027 GRC, and the 2031 GRC. In the 2023 GRC, PG&E received revenue requirement related to the Project for 2023-2026. PG&E's 2027 GRC included updated capital costs for 2025 and 2026 and requested the associated revenue requirement for years 2027-2030. Ongoing cost recovery will be requested in subsequent GRC cases, such as PG&E's 2031 GRC. Moreover, "cost caps" are only applicable to projects that require a CPCN, which no longer includes this Project.^{8/} Issues related to cost recovery can and should be addressed in future proceedings.

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^{8/} Ca. Pub. Util. Code 1005.5.

III. CONCLUSION

Based on the reasons stated above, and in the attached Tier 1 Advice Letter, PG&E respectfully requests that the Commission grant the motion to withdraw Application No. 25-04-004.

Respectfully Submitted,

DAVID T. KRASKA
DARRIN GAMBELIN

By: /s/ Darrin Gambelin

DARRIN GAMBELIN

Law Department
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612
Telephone: (650) 203-3177
E-Mail: darrin.gambelin@pge.com

Dated: February 4, 2026

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

EXHIBIT A

February 4, 2026

Advice 5175-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Tier 1 Information Only Submittal – S-238 Hinkley Compressor Station Electrical Upgrades Project Notice of Claimed Exemption Pursuant to General Order 177.

Pacific Gas and Electric Company (“PG&E”) hereby submits notice pursuant to General Order (“G.O.”) 177, Section IV. B.c., of a claimed exemption from the requirement to obtain a Certificate of Public Convenience and Necessity (“CPCN”) for projects necessary to prevent emergency conditions and ensure safe and reliable gas supplies.

I. Advice Letter Purpose

This Tier 1-Information Only advice letter provides the information required pursuant to G.O. 177 Section V. C.2., including a concise description of the proposed project; its purpose and its location; a summary of potential environmental impacts and any measures taken or proposed to reduce potential environmental impacts; and an explanation of why the project is exempted under G.O. 177.

II. Background

On April 9, 2025 PG&E filed an application (Application No. A2504004) with the California Public Utilities Commission (“CPUC” or “Commission”) for a CPCN to replace the Hinkley Compressor Station’s (“Station”) electrical distribution equipment, which has reached the end of its useful life and requires upgrades for safety, reliability, and maintainability (“Project”). As detailed below in Section V (G.O. 177 Exemption) the Station is critical to maintaining the proper gas pressure in gas transmission backbone Lines 300A and 300B (“Baja Path”) to move gas to areas of California north of the Station. Recent component failures and ongoing obsolescence issues that emerged in late summer 2025, after submittal of the CPCN application, have elevated concerns that the Station’s electric distribution equipment may not remain functional through the CPCN application period. There is risk that an additional unrepairable system failure could occur impacting reliable gas supplies prior to a decision on issuance of the CPCN (scheduled for the third or fourth quarter of 2026).

To prevent an unplanned outage that could result in loss of gas supply along the Baja Path, on January 20, 2026, consistent with the CPCN exemption set forth in G.O. 177 Section IV.B.c., PG&E commenced the entirety of the Project. With this Advice Letter, PG&E provides notice of its decision to claim an exemption from the requirement to obtain a CPCN for the Project.

III. Project Description

The Project will replace the compressor Station's electrical distribution equipment, which has reached the end of its useful life and requires upgrades for safety, reliability, and maintainability. The Station is one of eight PG&E gas compressor stations, statewide, which are crucial to gas system operations to meet customer supply demands. The Station operates almost continuously, using natural gas engine-driven reciprocal compressors to increase natural gas pressure causing gas to flow downstream through the Baja Path and other pipelines to customers.

The Station's electrical distribution equipment transmits power produced by on-site electrical generators to the Station's ancillary support systems. The Project will replace or modify existing electrical power switchgear, motor control center ("MCC"), and load center equipment. Connecting conduit and new or replacement cable will be installed between the switchgear and MCC locations. The Project includes connecting portable backup generators that will directly power the ancillary support systems, bypassing the electrical distribution equipment that will be replaced during the project. PG&E's gas transmission system, including the Station's natural gas engine driven compressors, pipes, valves, and gas measurement assets, will not be modified by the Project.

The Project commenced on January 20, 2026 and is expected to be completed in January 2028.

A. Project Location

The Hinkley Compressor Station is located at 35863 Fairview Road in the community of Hinkley in San Bernardino County, California (See figure in Attachment 1).

B. Project Purpose

The purpose of the Project is to replace the Station's electrical distribution system to increase reliability, maintainability, and operational safety. Because of its age, the electrical distribution system is at increased risk of failure, which could impact operation of the station and movement of gas along one of PG&E's major gas transmission systems. Much of the electrical distribution equipment is obsolete, requiring specialized training, procedures, and personal protective equipment to maintain safe and reliable operation. Inspection and maintenance on an aging system is also complex and inefficient. Additionally, the project upgrades will enable standard safety procedures and operation, inspection and maintenance efficiency, and cost savings.

IV. Summary of Environmental Impacts

Project environmental impacts are primarily construction related and the project has been planned and engineered to avoid or minimize the largely temporary impacts. PG&E will implement standard construction measures to avoid impacts.

V. G.O. 177 Exemption

The Project is exempt from obtaining a CPCN because it is necessary to prevent emergency conditions impacting PG&E's ability to ensure reliable gas supplies. Due to the potential risk and impact that could result from an unplanned and long duration outage at the Station caused by electrical distribution system failures and ongoing obsolescence issues, PG&E has commenced the Project in accordance with the exemption provided in G.O. 177, Section IV. B.c. This provision exempts Projects that would otherwise require a CPCN, but are needed to prevent an unplanned emergency that could occur prior to completion of the CPCN review process and result in loss of reliable gas supply.

G.O. 177 requires gas corporations to file an application for a CPCN for projects that exceed \$75 million.¹ An exemption from this requirement is provided for "emergency projects (for example: repairs, upgrades, replacements, restorations) as defined by CEQA Guidelines § 15269 and Public Resources Code §§ 21060.3 and 21080(b)(2) and (4) to ensure safe and reliable gas supplies."² Emergency projects include "specific actions necessary to prevent" an emergency and repairs to facilities necessary to maintain essential services.³ Projects are eligible for this exemption when it is anticipated that an emergency may occur prior to completion of the permit issuance process.⁴ The Commission stated that the intent of the G.O. 177 exemption for emergency projects is "not to impede rapid implementation of repairs or improvements to address emergency situations, including when the ability of the utility's gas system to meet its backbone, peak day, and cold day design standards is threatened."⁵

The Station plays a key role in meeting system-wide gas demand, especially during peak periods. Unlike localized transmission and distribution lines, backbone lines supply gas to the entire system. Therefore, any issue with a backbone pipeline or compressor station can impact all customers. If the Station is not operational, the Baja Path capacity drops significantly. On a 1:10 peak day, the Baja Path must operate near its maximum capacity to meet system-wide demand. Without Station operation, the system may not have enough capacity, even on much warmer days with less demand. In the event of a system-wide capacity shortfall, Emergency Flow Orders and curtailments—temporary reductions in service—may be necessary to maintain system integrity. Thus, the Station is crucial for maintaining gas reliability and minimizing service disruptions for all customers.

¹ G.O. 177 Section VI.A.

² G.O. 177 Section IV.B.c.

³ Pub. Res. Code 21080(b)(4); CEQA Guidelines 15269.

⁴ Guidelines 15269.

⁵ Decision 22-12-021 p. 41-42.

Recent component failures and ongoing obsolescence issues that emerged in late summer 2025, after submittal of the CPCN application for this Project, have elevated concerns that the Station's electric distribution equipment may not remain functional through the CPCN application review period. The Station's electrical distribution equipment is necessary for operation of the Station and failure of components of this system could result in partial or complete shutdown of the Station. There is risk that an additional unrepairable system failure could occur impacting reliable gas supplies prior to a decision on issuance of the CPCN (scheduled for the third or fourth quarter of 2026).

The Project will replace the compressor station's electrical distribution equipment, which has reached the end of its useful life and requires upgrades for safety, reliability, and maintainability. Much of the equipment that will be replaced in this project is obsolete and spare or replacement parts are difficult or impossible to obtain.

PG&E has determined that this project is necessary to prevent a potential emergency breakdown at the Station that could result in PG&E's inability to meet gas demand. Thus, PG&E has commenced the Project under the G.O. 177 exemption for emergency projects. The first phase of this project will install portable generators allowing the bypass of the electrical distribution equipment at the Station and will effectively prevent emergency conditions.

VI. Protests

This is an information-only advice letter submittal. Pursuant to G.O. 96-B Section 6.2, and G.O. 177 Section V.C.1.a., PG&E is not seeking relief through this advice letter and it is not subject to protest.

VII. Effective Date

The Company requests that this Tier 1 advice letter become effective on February 4, 2026. (In accordance with G.O. 177 Section V.C.1, this advice letter is submitted within 60 days of initiating the project.)

VIII. Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>. In addition, the Notice of Claimed Exemption, included in Attachment 2 is being sent to the parties identified in G.O. 177 Section V.C.1.b & c.



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 G)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Baylee Larson

Phone #: (279) 789-6486

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: baylee.larson@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5175-G

Tier Designation: Information-Only

Subject of AL: Tier 1 Information Only Submittal - S-238 Hinkley Compressor Station Electrical Upgrades Project Notice of Claimed Exemption Pursuant to General Order 177.

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 2/4/26

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

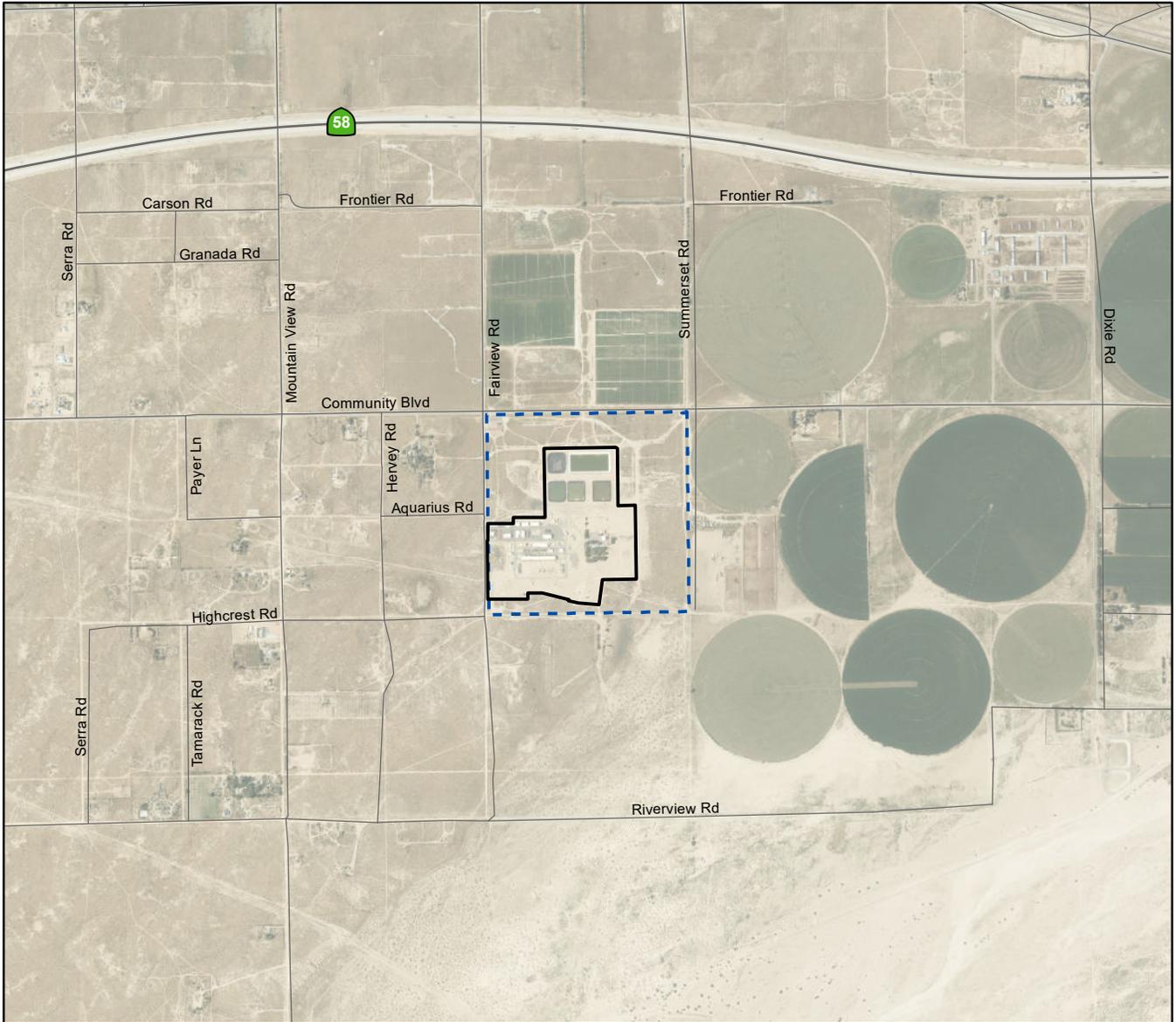
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

Attachment 1

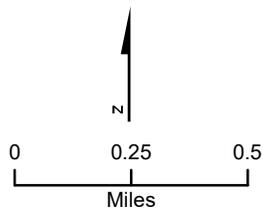
S-238 Notice of Exemption Map



Version: 1/12/2026

Legend

-  Hinkley Compressor Station
-  Perimeter Fence Line
-  Property Boundary



**Notice of Claimed Exemption
Project Overview**

S-238 Hinkley Electrical Upgrades
Pacific Gas & Electric Company

Attachment 2

Notice of Exemption of Hinkley

**NOTICE OF CLAIMED EXEMPTION FROM A
CERTIFICATE OF PUBLIC CONVENIENCE
AND NECESSITY**

PROJECT NAME: S-238 HINKLEY COMPRESSOR STATION ELECTRICAL UPGRADES PROJECT, County of San Bernardino

Project: Pacific Gas and Electric Company (PG&E) is replacing the electrical distribution system within the Hinkley Compressor Station (station), located at 35863 Fairview Road in the community of Hinkley, California, in San Bernardino County. The project will replace or modify the station's existing electrical distribution switchgear, motor control centers (MCCs), a load center and install connecting conduit and cables between the switchgear and MCC. These changes will address reliability, maintainability, and operational safety. PG&E began construction on January 20, 2026, and is planning to complete the project by January 2028, or as soon as possible.

Temporary generators, fueled by natural gas at the station, will be brought to the project work area to power the station during construction. They will be used during specific construction activities when electric equipment is deenergized. After the upgrade is complete, all temporary generator equipment will be removed.

Impacts: The project has been planned and engineered to avoid or minimize largely temporary environmental impacts. Project impacts are primarily construction related and PG&E will implement standard construction measures to further avoid or minimize impacts.

Exemption: The project had originally been filed as Application A.25-04-004 for a Certificate of Public Convenience and Necessity (CPCN). PG&E determined that to prevent a potential emergency potentially impacting transmission reliability it would proceed with the project construction under an emergency exemption from the permit requirement.¹ PG&E informed the CPUC of this in Advice Letter 5175-G.

CPUC Contact Information: To contact the CPUC Consumer Affairs Branch call 1-800-649-7570, visit the webpage www.cpuc.ca.gov/consumer-support, or write to the California Public Utilities Commission, Consumer Affairs Branch, 505 Van Ness Avenue, San Francisco, CA 94102-3298.

Additional Project Information: To obtain additional information on the project, please call PG&E's [Project Information Line](#) at (925) 244-3020 or email S238Hinkley@pge.com.

¹ GO 177 § IV.B.c.

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
Albion Power Company		Peninsula Clean Energy
Alta Power Group, LLC	Electrical Power Systems, Inc. Fresno	Pioneer Community Energy
Anderson & Poole	Engie North America	Public Advocates Office
BART	Engineers and Scientists of California	Redwood Coast Energy Authority
Ava Community Energy		Regulatory & Cogeneration Service, Inc.
BART		Resource Innovations
Buchalter	GenOn Energy, Inc.	Rockpoint Gas Storage
Barkovich & Yap, Inc.	Green Power Institute	
Biering & Brown LLP		San Diego Gas & Electric Company
Braun Blasing Smith Wynne, P.C.	Hanna & Morton LLP	San Jose Clean Energy
		SPURR
California Community Choice Association	ICF consulting	
California Cotton Ginners & Growers Association	iCommLaw	Sempra Utilities
California Energy Commission	International Power Technology	Sierra Telephone Company, Inc.
California Hub for Energy Efficiency	Intertie	Southern California Edison Company
California Alternative Energy and Advanced Transportation Financing Authority	Intestate Gas Services, Inc.	Southern California Gas Company
California Public Utilities Commission		Spark Energy
Calpine	Kaplan Kirsch LLP	Sun Light & Power
Cameron-Daniel, P.C.	Kelly Group	Sunshine Design
Casner, Steve	Ken Bohn Consulting	Stoel Rives LLP
Center for Biological Diversity	Keys & Fox LLP	
Chevron Pipeline and Power	Leviton Manufacturing Co., Inc. Los Angeles County Integrated	Tecogen, Inc.
		TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Clean Power Research	Waste Management Task Force	
Coast Economic Consulting		Utility Cost Management
Commercial Energy	MRW & Associates	
Crossborder Energy	Manatt Phelps Phillips	
Crown Road Energy, LLC	Marin Energy Authority	
	McClintock IP	Water and Energy Consulting
	McKenzie & Associates	
Davis Wright Tremaine LLP	Modesto Irrigation District	
Day Carter Murphy	NLine Energy Inc.	
Dept of General Services	NOSSAMAN LLP	Yep Energy
Douglass & Liddell	NRG Energy Inc.	
Downey Brand LLP		