

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Order Instituting Investigation on the  
Commission's Own Motion into  
Natural Gas Prices During Winter  
2022-2023 and Resulting Impacts to  
Energy Markets.

**OPENING COMMENTS OF ENVIRONMENTAL DEFENSE FUND  
ON THE PROPOSED DECISION**

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February 12, 2026

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Environmental Defense Fund (EDF) respectfully submits these Opening Comments on the Proposed Decision Regarding the Causes and Contributors to the 2022-2023 Gas Price Spike and Adopting Directions to Reduce the Likelihood or Mitigate the Impact of Future Gas Price Spikes mailed on January 23, 2026. Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, these comments are timely submitted.

EDF thanks the Commission for a well-reasoned decision into the underlying causes and contributors to the natural gas price spike of the winter of 2022-2023. EDF also appreciates that the Commission is not overly relying on new physical infrastructure to reduce the likelihood of future gas price spikes.

On the definition of the gas price spike, EDF appreciates that the proposed decision adopts EDF's recommendation that it uses the physical impact on the bill (rather than the potential savings from electrification). The proposed decision establishes the price spike at 150% of the monthly core procurement price compared to the ten-year average<sup>1</sup>. EDF suggests that this threshold is perhaps too high to capture all price spike events, and encourages the Commission to revise the PD to a lower threshold of 100% above the average price. In essence, if natural gas prices have doubled during winter months, the Commission should implement the Tier 1

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<sup>1</sup> Proposed Decision, at 54.

protocols spelled out in the PD. While the PD gives Pacific Gas and Electric (PG&E) and Southern California Gas Company (SoCalGas) discretion to notify the Commission's Executive Director if there is price volatility below the proposed 150% threshold; however, the utilities already have discretion to notify the Commission's Executive Director of anything they think is in the best service of their customers. EDF encourages the Commission to require the utilities to notify them when natural gas prices have doubled. This requires a modification to Conclusion of Law #1 in the Proposed Decision, as outlined in the attached Appendix.

EDF is disappointed that the Proposed Decision declines to require the gas utilities to provide community resource centers for customers to utilize during a natural gas price spike event. The recommendation was supported by a large cross section of customers, including EDF, SBUA and TURN. Extreme cold – like extreme heat during the summer months – is both a matter of affordability and health; with the climate crisis only worsening, the need for these CRCs during cold snaps will only become more acute. EDF strongly encourages the Commission to reconsider the rationale as to why this was denied – the issues of cost and logistics are all solvable and have been done so for cooling centers by the electric utilities. If the Commission decides to not revise this recommendation, EDF then recommends the Commission to *require* the gas utilities<sup>2</sup> (as opposed to simply encouraging them) to keep an updated list up to date at all times. EDF suggests two new Conclusions of Law to support this recommendation.

On the topic of Independent Storage Providers<sup>3</sup>, EDF previously recommended that they be required to furnish pricing information on their websites at non-ratepayer expense. The PD agrees with EDF, in part, but limits the full adoption due to concerns of anti-competitive behavior. EDF

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<sup>2</sup> See Proposed Decision, at 67-68

<sup>3</sup> See Proposed Decision, at 140

agrees with the PD's sound reasoning on this point, and is fine with monthly (as opposed to daily) reporting.

For the reasons detailed above, EDF is supportive of the Proposed Decision overall. However, EDF requests that the changes described above and embedded Appendix A hereto (three new Conclusions of Law) be included in the Commission's Final Decision.

Respectfully submitted on February 12, 2026.

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## APPENDIX A

### ENVIRONMENTAL DEFENSE FUND PROPOSED REVISIONS TO CONCLUSIONS OF LAW FOR THE PROPOSED DECISION

Environmental Defense Fund (EDF) proposes the following modifications to the Conclusions of Law on the Proposed Decision.

Please note the following:

- Added language is indicated by **bold type**; removed language is indicated by **bold strike-through**.
- 1) Conclusion of Law 1: It is reasonable to define a gas price spike as a ~~150~~ **100** percent increase in the monthly core procurement price relative to the 10-year average core procurement price for that month during the winter season (November-March).
- 2) Conclusion of Law 94: ~~Utilities are not equipped to provide equitable access to CRCs.~~ **Utilities could study lessons learned from the electric utilities cooling centers to ensure equitable access to CRCs.**
- 3) Conclusion of Law 95: Local governments and health departments may have information and resources to assist Californians with their day-to-day needs during a gas price spike. **It is reasonable for the gas utilities to be required to coordinate with local governments to ensure adequate information is available for their customers in the event of a natural gas price spike event.**