



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

04/27/26

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C2604014

Clinton Wills d/b/a Clint's Pumping Service
(CPS); Drilling Exploration & Operating
Company, Inc. (DE&O); and The Termo
Company,

Complainants,

vs.

Pacific Gas and Electric Company (U39E),

Defendant.

Case (C.)

Complaint
(Rule 4.2)

| COMPLAINANTS | DEFENDANT |
|--|--|
| <p>Clinton Wills d/b/a Clint's Pumping Service (CPS); Drilling Exploration & Operating Company, Inc. (DE&O) Attn: Clinton Wills 208 Commercial St Princeton CA 95970 T: 530-682-2378 E-mail: clintonwills@gmail.com</p> <p>The Termo Company Attn: Bill Buss 3275 Cherry Ave Long Beach CA 90807 T: 562-595-7401 E-mail 1: billb@termoco.com E-mail 2: ralphc@termoco.com</p> | <p>Pacific Gas and Electric Company (U39E) Attn: Cliff Gleicher, Managing Counsel 300 Lakeside Drive Oakland CA 94612 T1: 415-971-2678 E-mail 1: Cliff.Gleicher@pge.com E-mail 2: pgetariffs@pge.com</p> |

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A) Clinton Wills, DBA Clint's Pumping Service (CPS)
 Drilling, Exploration & Operating Co., Inc.
 (DE&O) The Termo Company

COMPLAINANT(S)

vs.

(B) Pacific Gas and Electric Company

DEFENDANT(S)

(Include Utility "U-Number," if known)

(for Commission use only)

(C) Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?
 YES NO

Did you appeal to the Consumer Affairs Manager?
 YES NO

Has staff responded to your complaint?
 YES NO

Do you have money on deposit with the Commission?
 YES NO

Amount \$ _____

Is your service now disconnected?
 YES NO

COMPLAINT

(D) The complaint of (Provide name, address and phone number for each complainant)

| Name of Complainant(s) | Address | Daytime Phone Number |
|-------------------------|--------------------------------------|----------------------|
| Clinton Wills DBA (CPS) | 208 Commercial St Princeton CA 95970 | (530)682-2378 |
| DE&O | 208 Commercial St Princeton CA 95970 | (530) 682-2378 |
| The Termo Company | 3275 Cherry Ave Long Beach, CA 90807 | (562) 595-7401 |

respectfully shows that:

(E) Defendant(s) (Provide name, address and phone number for each defendant)

| Name of Defendant(s) | Address | Daytime Phone Number |
|----------------------------------|---|----------------------|
| Pacific Gas and Electric Company | 245 Market Street San Francisco, CA 94105 | 1-800-743-5000 |

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

This complaint concerns Pacific Gas and Electric Company's conduct regarding corrosion monitoring equipment installations required at natural gas sales points connected to PG&E's regulated transmission system. Complainants are natural gas producers and service providers whose production and operations depend upon access to PG&E's regulated gas delivery infrastructure. In 2025 PG&E required corrosion monitoring equipment installations at producer sales points connected to its gas transmission system. Prior to September 1, 2025, several producers had this equipment installed by PG&E at no cost. However, after those installations were completed, PG&E began demanding approximately \$184,000 per sales point for materially similar installations at other locations. These installations were required as a condition of continuing gas deliveries into PG&E's system. When certain producers declined to pay the \$184,000 cost, PG&E terminated their sales points effective September 1, 2025, resulting in immediate shutdown of gas production. Several producers lost access to the system simultaneously.

(G) Scoping Memo Information (Rule 4.2[a])

(1) The proposed category for the Complaint is (check one):

- adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
 ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)? YES NO

(3) Regular Complaint Expedited Complaint (Rule 4.6)

(4) The issues to be considered are

(Example: The utility should refund the overbilled amount of \$78.00):

1. Whether PG&E violated Public Utilities Code §453 by applying discriminatory cost allocations to similarly situated producers.
2. Whether PG&E violated Public Utilities Code §451 by conditioning continued service upon payment of unjust or unreasonable costs.
3. Whether PG&E violated or improperly disregarded existing interconnection agreements, including Section 2.2.4.
4. What tariff authority, if any, PG&E relied upon to require the installations to be performed exclusively by PG&E.

(5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.
Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09): 5/20/2026

Hearing (Example: 7/1/09): 6/18/2026

Explain here if you propose a schedule different from the above guidelines.

[Empty box for explaining a different schedule]

(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

1. Investigation
2. Restore market access
3. Additional appropriate relief


(I)

OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

clintonwills@gmail.com; billb@termoco.com; ralphc@termoco.com

(J)

Dated Princeton / Long Beach, California, this 8th day of April, 2026
(City) (date) (month) (year)


Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

(K)

REPRESENTATIVE'S INFORMATION:

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: Clinton Wills

Address: 208 Commercial St Princeton CA 95970

Telephone Number: 530-682-2378

E-mail: ClintonWills@gmail.com

Signature: 

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(L)

Executed on 4/8/26, at Princeton, California
(date) (City)



(Complainant Signature)

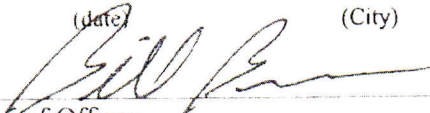
VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(M)

Executed on 4/8/26, at Long Beach, California
(date) (City)



Signature of Officer

Vice President, Operations
Title

(N) NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one (1) defendant, then you must submit a total of eight (8) copies.

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

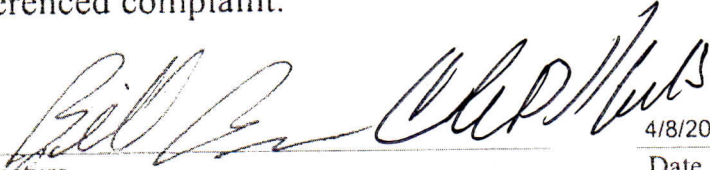
(O) Mail paper copies to: California Public Utilities Commission
Attn: Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.


Signature 4/8/2026
Date

Bill Buss *Clinton Wills*
Print your name