

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



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Joint Application of Brookfield Infrastructure Fund GP II, LLC, Rockpoint Gas Storage Inc., Wild Goose Storage, LLC (U-911-G), and Lodi Gas Storage L.L.C. (U-912-G) for Authority Under Public Utilities Code Section 854 to Transfer Indirect Control of Wild Goose Storage, LLC and Lodi Gas Storage L.L.C.

Application 26-01-004
(Filed January 12, 2026)

JOINT PREHEARING CONFERENCE STATEMENT

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Dated: May 26, 2026

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

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JOINT PREHEARING CONFERENCE STATEMENT

In accordance with the Administrative Law Judge’s May 11, 2026 ruling granting party status to the Public Advocates Office, setting the prehearing conference, and directing parties to submit statements, Brookfield Infrastructure Fund GP II, LLC (BIF GP II) acting by and through its subsidiaries, Rockpoint Gas Storage Inc. (RGS), Wild Goose Storage, LLC (Wild Goose), and Lodi Gas Storage, L.L.C. (Lodi) (together, the Joint Applicants), and the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) (together with the Joint Applicants, the Parties), submit this joint prehearing conference statement.

I. ISSUES TO BE ADDRESSED

The Parties met and conferred, as directed by the Administrative Law Judge’s ruling, on May 20, 2026. The Parties did not reach consensus on the four issues to be addressed in the prehearing conference statement, but submit this joint statement providing their separate positions in the interests of efficiency.

A. Proposed Issues In Scope

1. Joint Applicants’ Position

The Joint Applicants continue to recommend that the issues to be considered in this

proceeding be the ones set forth in the application:

1. Whether the proposed transaction would constitute a transfer of indirect control of Wild Goose and Lodi to RGSi.
2. Whether the transfer of indirect control of Wild Goose and Lodi by means of the proposed transaction(s) is not adverse to the public interest and should therefore be approved.

2. Cal Advocates' Position

Cal Advocates recommends that the following issues be addressed in this proceeding:

- a. Whether the proposed transaction will affect the day-to-day operations and management of the utilities;
- b. Whether the proposed transaction will affect Wild Goose and Lodi's ability to provide safe and reliable service; and
- c. Whether the combination of Wild Goose and Lodi under the common ownership of RGSi would harm competition in the California gas storage market.

B. The Need For Evidentiary Hearings

1. Joint Applicants' Position

The Joint Applicants do not believe evidentiary hearings will be necessary. Given the nature of the proposed transaction, which is an equity transaction occurring at the parent company level, and the fact that the transaction documents, which set forth the material facts relevant to the application, are already in the record, testimony or cross-examination would have no additional substantive value. The transaction documents speak for themselves, and they govern the application. Additionally, Wild Goose and Lodi have no retail, or captive, customers, and the proposed transaction will have no effect on Wild Goose or Lodi's tariffs or operations or, by transfer, utility customers.

2. Cal Advocates' Position

Despite Joint Applicants' assertions, Cal Advocates has not yet completed its review of the Application and may request evidentiary hearings if there are material disputed issues of fact that would necessitate hearings.

C. Proposed Schedule For The Proceeding

1. Joint Applicants' Position

The Joint Applicants maintain that an expeditious schedule is both appropriate and feasible. Because discovery, testimony, and hearings are unlikely to be necessary, the Joint Applicants propose the following schedule:

Application filed	January 12, 2026
Protests or responses due	February 13, 2026
Prehearing Conference	June 1, 2026
Scoping Ruling issued	July 2026
Proposed Decision issued	September 2026
Final Commission Decision	October 2026

2. Cal Advocates' Position

Cal Advocates will need more time to conduct further analysis and potentially prepare testimony. Cal Advocates requests that intervenor testimony be due October 30, 2026 due to limited resources and the need to staff other proceedings. Cal Advocates proposes the following schedule:

Intervenor Testimony	October 30, 2026
Opening Brief	Mid March 2027
Reply Brief	April 2027

D. Any Motions The Parties Anticipate Filing

1. Joint Applicants' Position

The Joint Applicants do not anticipate filing any motions.

2. Cal Advocates' Position

Cal Advocates reserves the right to file motions as necessary.

II. CONCLUSION

The Parties appreciate the opportunity to submit this joint prehearing conference statement.

Dated: May 26, 2026

Respectfully submitted,

PUBLIC ADVOCATES OFFICE

BRB Law LLP

By: /s/ Marybelle Ang

By: /s/ Megan J. Somogyi

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