

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Complaint of:

CLINTON WILLS, DBA CLINT'S PUMPING
SERVICE (CPS);
DRILLING, EXPLORATION & OPERATING CO.,
INC. (DE&O);
and THE TERMO COMPANY,

Complainants,

v.

PACIFIC GAS AND ELECTRIC COMPANY (PG&E)
(U 39 E),

Respondent.

Case No. C.26-04-014

(Filed April 27, 2026)

**MOTION OF THE TERMO COMPANY TO WITHDRAW AS COMPLAINANT
AND FOR DISMISSAL OF ITS CLAIMS WITHOUT PREJUDICE**

(The Termo Company)

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Dated: July 27, 2026 E-mail: BillB@termoco.com

Self-Represented, on behalf of The Termo Company

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OF THE STATE OF CALIFORNIA**

Complaint of:	Case No. C.26-04-014
CLINTON WILLS, DBA CLINT’S PUMPING SERVICE (CPS); DRILLING, EXPLORATION & OPERATING CO., INC. (DE&O); and THE TERMO COMPANY, <i>Complainants,</i>	(Filed April 27, 2026)
v. PACIFIC GAS AND ELECTRIC COMPANY (PG&E) (U 39 E), <i>Respondent.</i>	

**MOTION OF THE TERMO COMPANY TO WITHDRAW AS COMPLAINANT
AND FOR DISMISSAL OF ITS CLAIMS WITHOUT PREJUDICE**

(The Termo Company)

Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, The Termo Company (“Termo”), one of three Complainants in this proceeding, respectfully moves to withdraw as a Complainant and for dismissal of its individual claims against Pacific Gas and Electric Company (“PG&E”) without prejudice. In support, Termo states as follows.

I. BACKGROUND

This complaint was filed on April 27, 2026, by three Complainants: Clinton Wills, dba Clint’s Pumping Service; Drilling, Exploration & Operating Co., Inc. (“DE&O”); and Termo. Termo held CPIOA No. 5044 with PG&E for two receipt points, Meter 04305 (Doheny 39-3) and Meter

00506 (Bounde Creek 1-4). PG&E filed its Answer on June 22, 2026. No prehearing conference has yet been held and no evidentiary hearing has been scheduled.

II. BASIS FOR WITHDRAWAL

After review, Terno has determined that continued participation in this proceeding is not economically warranted. The cost PG&E has quoted for the disputed internal corrosion monitoring equipment at Meter 04305 exceeds the value of the production that receipt point would support, and Terno intends to proceed with abandonment of the affected wells in the ordinary course of its operations. Terno therefore seeks to withdraw as an active party. Terno does not, by this motion, concede the merits of any claim or defense in this proceeding.

III. WITHDRAWAL SHOULD BE WITHOUT PREJUDICE

Terno requests that its withdrawal and the dismissal of its individual claims be without prejudice. Dismissal without prejudice preserves Terno's rights, reflects that Terno's withdrawal is a business decision rather than a concession on the merits, and is appropriate at this early stage of the proceeding. Terno notes that the factual admissions in PG&E's Answer, and the exhibits already placed in the record, remain part of the record and available to the remaining Complainants; Terno's withdrawal does not remove them.

IV. GRANTING THE MOTION WILL NOT PREJUDICE THE REMAINING PARTIES

The two remaining Complainants intend to continue prosecuting this complaint, and PG&E has already answered. Because the prehearing conference has not yet been held and no evidentiary hearing has been scheduled, Terno's withdrawal at this juncture streamlines the proceeding and prejudices no party.

V. POSITION OF THE PARTIES

Terno has conferred with PG&E's counsel of record, Lisa-Marie Clark, regarding this motion. PG&E does not oppose the relief requested. The remaining Complainants do not oppose this motion.

VI. CONCLUSION

For the foregoing reasons, Terno respectfully requests that the Administrative Law Judge (1) grant this motion; (2) dismiss The Terno Company's individual claims in this proceeding without prejudice; and (3) remove The Terno Company as an active party while retaining it on

the service list in the “Information Only” category, so that Termo continues to receive filings, rulings, and notices in this proceeding.

For purposes of “Information Only” service, Termo’s contact is Bill Buss, Vice President, Operations, The Termo Company, 3275 Cherry Avenue, Long Beach, CA 90807, (562) 595-7401, BillB@termoco.com.

Respectfully submitted,

/s/ Bill Buss

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