

SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

OBJECTIONS TO INSTRUCTIONS

SoCalGas provides the following Responses to the Indicated Shippers' data request dated June 28, 2022 in A.22-02-007. The Responses are based upon the best available, non-privileged information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request, and within SoCalGas's possession, custody, or control. SoCalGas reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

SoCalGas objects to the instructions submitted by Indicated Shippers and to the continuing and indefinite nature of this request on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature and continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(d) and 030.060(g), respectively. SoCalGas will provide responsive documents in existence at the time of its response. Should Indicated Shippers seek to update its request, SoCalGas will respond to such a request as a new data request in the future.

SoCalGas further objects to the instructions to the extent they ask SoCalGas to identify individuals directly or indirectly responsible for providing responses and to designate a witness to cross-examine at hearing concerning the response on the basis the instruction is unduly burdensome, including because the Assigned Commissioner's Scoping Memo and Ruling in this proceeding determines that evidentiary hearing is not needed.

SoCalGas additionally objects to the instructions to the extent they ask SoCalGas to provide "such data or documents as are available" if "information is not available in the exact form requested" on the basis the instruction is vague and ambiguous and unintelligible and fails to reasonably particularize the data or documents sought. SoCalGas also objects to the instructions to the extent they seek to impose the burden of resolving ambiguities in the request on SoCalGas and seek unduly burdensome stapling, bounding, and/or numbering.

SoCalGas submits these Responses, while generally objecting to any Request that fails to provide a defined time period to which SoCalGas may tailor its Response, and to the extent that any Request is overly broad, vague, ambiguous, unduly burdensome, assumes facts, or otherwise fails to describe with reasonable particularity the information sought. SoCalGas further submits these Responses without conceding the relevance of the subject matter of any Request or Response. SoCalGas reserves the right to object to use of these Responses, or information contained therein, in any dispute, matter or legal proceeding.

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Date Requested: June 28, 2022; Date Responded: July 13, 2022

DATA REQUEST RESPONSES

For the purpose of this data request, the following definitions apply.

“SoCalGas” includes SoCalGas and any of its corporate affiliates (including parents and subsidiaries), any of SoCalGas’s agents, and any other individual appearing to act on SoCalGas’s behalf, including advisors, consultants, and partner organizations.

“HyDeal Los Angeles” also refers to “HyDeal LA.”

QUESTION 1-1:

Please refer to SoCalGas’s Application at pages 23-24, which lists various cost elements and an estimated cost of \$26 million for Phase 1. For Phase 1, please provide an itemized estimate and timeline of all costs related to “Stakeholder meetings and engagement.”

RESPONSE 1-1:

SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner’s Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see the attached workpapers supporting the estimated cost of \$26 million for Phase 1. An itemized estimate and timeline of all costs related to stakeholder meetings and engagement has not been developed.

As described on page 54 of SoCalGas’s Opening Brief, SoCalGas is committed to gathering and addressing stakeholder concerns through three primary tools: (1) stakeholder engagement via quarterly public webinars, town halls, and workshops to gather stakeholder feedback on Project planning, design, and development and to respond to key areas of concern; (2) interim reporting and updates to disseminate information to the Commission and the public regarding Project planning, design, and development through the Angeles Link website, published reports, and newsletters; and (3) input from the Planning Advisory Group on key areas of stakeholder concern.

On May 19 and May 31, 2022, SoCalGas hosted informational webinars regarding Angeles Link. The Angeles Link website (www.socalgas.com/angeleslink) communicates key Project

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proposal updates and includes an opt-in service list for periodic newsletters, the first of which was issued on June 9, 2022. Future stakeholder meetings and engagement will be prominently communicated to elicit robust participation. SoCalGas has also proposed ongoing outreach to stakeholders through a future Planning Advisory Group.

**SOUTHERN CALIFORNIA GAS COMPANY
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(A.22-02-007)

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Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-2:

Please provide all documents and communications that form the basis for SoCalGas's itemized estimate and timeline in Question 1-1, including workpapers, data, and calculations.

RESPONSE 1-2:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 1-1.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-3:

Please refer to SoCalGas's Application at pages 25-27, which lists various cost elements and an estimated cost of \$92 million for Phase 2. For Phase 2, please provide an itemized estimate and timeline of all costs related to "Stakeholder meetings and engagement."

RESPONSE 1-3:

SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see the workpapers attached to Response 1-1 supporting the estimated cost of \$92 million for Phase 2. An itemized estimate and timeline of all costs related to stakeholder meetings and engagement has not been developed.

In general terms, the stakeholder outreach in Phase 2 is anticipated to include the elements described in Response 1-1. In addition, as described on page 59 of SoCalGas's Opening Brief, SoCalGas has committed to hold a public workshop once preferred routes are identified, which is planned for Phase 2. In addition, as described on page 60 of SoCalGas's Opening Brief, during Phases 1 and 2, SoCalGas will continue to seek environmental justice community input regarding proposed pipeline routing scenarios, enabling SoCalGas to proactively address impacts to such communities from Project construction and operation.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-4:

Please provide all documents and communications that form the basis for SoCalGas's itemized estimate and timeline in Question 1-3, including workpapers, data, and calculations.

RESPONSE 1-4:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 1-3.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-5:

Please describe all stakeholder meetings and engagement that SoCalGas expects its partner organizations will undertake with respect to green hydrogen infrastructure intended to serve the Los Angeles Basin.

RESPONSE 1-5:

SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas also objects to the request to the extent it calls for speculation. SoCalGas further objects to the extent the request is vague and ambiguous with respect to the term "partner organizations," and therefore likely seeks information not known by SoCalGas. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas has not identified any organizations in its Application or Opening Brief who have agreed to partner with SoCalGas in undertaking stakeholder meetings and engagement on its behalf. The memorandum account application and SoCalGas's Opening Brief describe the establishment of a Planning Advisory Group that would provide advice and collaboration on Project design and development; commit to holding periodic public workshops as the Project proceeds, including at the end of each phase and once preferred routes are identified; and propose to submit interim reports to the Commission and the public regarding Project status and updates. The Planning Advisory Group is in the process of being established.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-6:

Regarding the relationship between SoCalGas and the Green Hydrogen Coalition:

- a. What is the nature of the relationship between SoCalGas and the Green Hydrogen Coalition?
- b. Did SoCalGas participate in any way in the founding of the Green Hydrogen Coalition?
- c. Does SoCalGas sponsor, finance, fund, or in any way provide material support to the Green Hydrogen Coalition?
 - i. If so, please list the amount of funding and describe any other forms of support for the years 2019, 2020, 2021, and 2022.

RESPONSE 1-6:

- a. SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The Green Hydrogen Coalition (GHC) is an independent 501(c)3 organization operated and staffed by Strategen. As shown on Green Hydrogen Coalition's (GHC) website, SoCalGas is one of eight Leadership Circle level supporters. SoCalGas's financial contributions are made with shareholder dollars. Additional California utilities, including PG&E and SDG&E, support GHC at other levels. SoCalGas participates in certain stakeholder meetings and discussions organized and facilitated by GHC, but SoCalGas does not hold membership on the GHC board.

- b. SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Besides being a financial contributor, no.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

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- c. SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner’s Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 1-6(a), which describes SoCalGas’s relationship with GHC. The following financial contributions were made with shareholder dollars.

- i. 2019: \$0
2020: \$25,000
2021: \$125,000 (inclusive of \$100,000 for HyDeal LA)
2022: \$300,000 YTD (inclusive of \$200,000 for HyDeal LA and Western Green Hydrogen Initiative)

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-7:

Please provide all documents and communications related to the relationship between SoCalGas and the Green Hydrogen Coalition.

RESPONSE 1-7:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-8:

Regarding the relationship between SoCalGas and HyDeal Los Angeles:

- a. What is the nature of the relationship between SoCalGas and HyDeal Los Angeles?
- b. Did SoCalGas participate in any way in the founding of HyDeal Los Angeles?
- c. Does SoCalGas sponsor, finance, fund, or in any way provide material support to HyDeal Los Angeles?
 - i. If so, please describe list the amount of funding and describe any other forms of support for the years 2019, 2020, 2021, and 2022.

RESPONSE 1-8:

- a. SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

HyDeal LA is the first regional initiative in the GHC's HyDeal North America Platform. As shown on GHC's website, SoCalGas is one of 10 donors to the HyDeal Los Angeles initiative. SoCalGas's financial contributions are made with shareholder dollars. SoCalGas participates in certain stakeholder meetings and discussions organized and facilitated by GHC for HyDeal LA, but SoCalGas is not a HyDeal LA advisor.

- b. SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Besides being a financial contributor, no.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

- c. SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 1-6(c), 1-8(a), and Response 1-10.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-9:

Please provide all documents and communications related to the relationship between SoCalGas and HyDeal Los Angeles.

RESPONSE 1-9:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-10:

What was the involvement of SoCalGas with the HyDeal Los Angeles Phase 1 study? Please provide a copy of the HyDeal LA Phase 1 study and all documents and communications related to it, including workpapers, data, calculations, surveys, emails, and memoranda.

RESPONSE 1-10:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to the extent the request seeks information not known by SoCalGas. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas was a donor to the HyDeal Phase 1 initiative, participated in steering committee meetings led by GHC, and provided technical collaboration.

The public presentation for Phase 1 is available here:

<https://static1.squarespace.com/static/5e8961cdcbb9c05d73b3f9c4/t/61395af7e252d140fd159522/1631148798127/2021-09-08+HyDeal+Presentation+Slides%2C+DOE+Hydrogen+Shot+Summit.pdf>.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

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QUESTION 1-11:

What was the involvement of SoCalGas with the Green Hydrogen Coalition's DOE Hydrogen Program Response to RFI #DE-FOA-0002529? Please provide a copy of the RFI response and all documents and communications related to it, including workpapers, data, calculations, surveys, emails, and memoranda.

RESPONSE 1-11:

SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to the extent the request seeks information not known by or available to SoCalGas. Subject to and without waiving the forgoing objections, SoCalGas responds as follows.

SoCalGas – among other entities – had the opportunity to review and provide comment to GHC's submission. The response is available at:

https://static1.squarespace.com/static/5e8961cdcb9c05d73b3f9c4/t/60ef84fb65edb26c8618d579/1626309884328/GHC+HyDeal_H2+Earthshots+RFI+response_July2021_HyDealSupporters.pdf.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

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QUESTION 1-12:

Please provide all communications with local, state, or federal government officials or staff related to either the Angeles Link Project or HyDeal Los Angeles.

RESPONSE 1-12:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks "all communications" "related to" either the Angeles Link Project or HyDeal LA. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 16 to data request Sierra Club-01.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-13:

Except for documents responsive to Question 1-12, please provide all documents regarding communications with local, state, or federal government officials or staff related to either the Angeles Link Project or HyDeal Los Angeles.

RESPONSE 1-13:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks "all documents" "related to" either the Angeles Link Project or HyDeal LA. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see SoCalGas's informational webinar presentation at the following link:
<https://www.socalgas.com/sites/default/files/2022-05/Informational%20Webinar%205.19.pdf>.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-14:

Please provide all documents and communications related to the examination, evaluation, or study of SoCalGas's existing methane transmission and distribution pipelines for their suitability to support hydrogen transmission.

RESPONSE 1-14:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas assumes the question refers to dedicated 100% hydrogen infrastructure, for which SoCalGas has not specifically studied whether its existing transmission and distribution pipelines would be suitable to support 100% hydrogen transmission. At this time, we generally anticipate Angeles Link to be comprised of new infrastructure. Assessment and design of the proposed system will occur in Phases 1 through 3, including any opportunities to repurpose any extant pipelines or other facilities.

In CPUC Application (A.) 20-11-004, SoCalGas sought CPUC approval to implement a hydrogen blending demonstration program and to develop and implement a hydrogen injection standard. Chapter 4 details the literature review, research and studies conducted by the Joint Utilities to determine the feasibility of utilizing their existing natural gas infrastructure for hydrogen blending. The application and testimony are available here: <https://www.socalgas.com/regulatory/a20-11-004>.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-15:

Please provide all documents and communications related to the potential costs of HyDeal Los Angeles, including system modeling work, transmission, and estimation of the levelized cost of hydrogen.

RESPONSE 1-15:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to the extent the request seeks information not known by or available to SoCalGas, or seeks confidential and proprietary information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 1-10.

SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-16:

Is SoCalGas aware of any natural or engineered underground caverns or other geologic formations in California that are expected to be available for large-scale storage of hydrogen?

a. If so, please identify them and their expected capacity. If SoCalGas is not aware of any, does SoCalGas have knowledge of any plans to develop large-scale storage facilities for hydrogen?

i. If so, please describe SoCalGas's knowledge, including its basis for belief regarding whether such facilities would be located inside California.

RESPONSE 1-16:

SoCalGas objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to the term "expected to be available" as vague and ambiguous. SoCalGas further objects to the extent the request seeks information not known by or available to SoCalGas, or seeks confidential and proprietary information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

With respect to underground storage of hydrogen, SoCalGas proposes to commence storage analyses to support a pre-FEED analysis for options for Angeles Link in Phase 1. This would include a high-level, preliminary study of hydrogen storage options to facilitate system operability, processing, and reliability. As described in the Application, SoCalGas has also conducted initial scoping activities to better understand the feasibility of hydrogen market opportunities, including possible conceptual solutions, challenges, and risks to hydrogen delivery. These activities included a pre-feasibility assessment of conceptual hydrogen storage locations in California.

a. With respect to the first sentence of (a), SoCalGas objects to the extent the request seeks confidential and proprietary information. With respect to the second sentence of (a), at this time, SoCalGas does not have knowledge of any specific plans to develop large-scale storage facilities for hydrogen in California. The issue of large-scale storage facilities will be evaluated further in Phase 1.

i. Please see the response above.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-17:

Please refer to SoCalGas's Application at page 17¹, which states that SoCalGas has joined HyDeal Los Angeles, which aims to achieve at-scale green hydrogen procurement at \$1.50/kilogram in the Los Angeles Basin by 2030. Does SoCalGas believe that it is possible to achieve \$1.50/kilogram at scale without the use of out-of-state hydrogen storage or other out-of-state infrastructure? Please explain the basis for SoCalGas's belief and provide all documents and communications that form the basis for SoCalGas's response, including workpapers, data, and calculations.

RESPONSE 1-17:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to the request to the extent it calls for speculation. Subject to and without waiving the forgoing objections, SoCalGas responds as follows.

As stated at 23 in the application, Phase 1 includes, "High-level, preliminary study of hydrogen storage options to facilitate system operability, processing, and reliability." Further, as stated at 26 in the application, Phase 2 includes a "Refined analysis of hydrogen storage options to facilitate system operability, processing, and reliability." These analyses will inform cost estimates for ultimate construction of a hydrogen energy transport system, including the costs of the commodity.

¹ SoCalGas believes the question intends to refer to page 18.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-18:

Please list all potential end users for the Angeles Link Project or a similar hydrogen project identified by SoCalGas, HyDeal Los Angeles, Los Angeles Department of Water and Power, or any of SoCalGas's other partner organizations.

RESPONSE 1-18:

SoCalGas objects to the request as vague and ambiguous with respect to the term "potential end users." SoCalGas also objects to the request as overly broad, particularly to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to the request to the extent it seeks protected confidential market sensitive and/or trade secret information. SoCalGas also objects to the extent the request seeks information not known by or available to SoCalGas. Subject to and without waiving the forgoing objections, SoCalGas responds as follows.

SoCalGas interprets the term "potential end users" to mean entities or individuals that have expressed a desire to enter into a contractual commitment to receive service from Angeles Link and have therefore begun discussing delivery specifications. Given that definition, SoCalGas has not identified any potential end users at this time. However, as noted in the application, SoCalGas expects target customer segments for Angeles Link to be heavy-duty transportation, "hard-to-electrify" industries, and electric generation. See, e.g., Application at 2. Additionally, as noted in the Application at 23, Phase 1 of the Project is anticipated to include a "(r)efined assessment of expected green hydrogen demand and identification of initial and subsequent end users in the Los Angeles Basin, including the anticipated timing for any necessary facility conversions to allow for the use of hydrogen as a fuel source."

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
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(A.22-02-007)

(1st DATA REQUEST FROM THE INDICATED SHIPPERS)

Date Requested: June 28, 2022; Date Responded: July 13, 2022

QUESTION 1-19:

For each potential end user identified in Question 1-10², please specify whether the end user is a current or former SoCalGas ratepayer, and please provide any projections for each end user's capacity of hydrogen demanded and estimated timeline for such demand.

RESPONSE 1-19:

SoCalGas objects to the request to the extent it seeks protected confidential, customer-specific information. SoCalGas also objects to the request to the extent it seeks information that is outside the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas has not discussed projections of hydrogen firm capacity needs with any potential end users, as that term is defined in Response 1-18.

² SoCalGas believes the question intends to refer to Question 1-18.