

Angeles Link Phase 1 Reasonableness Review

Chapter 2 Workpapers: Final Environmental Social Justice (ESJ) Community Engagement Plan and ESJ Screening

I. Introduction

This workpaper provides details of the prudent and reasonable activities taken to develop the Environmental Social Justice (ESJ) Community Engagement Plan (ESJ Plan) in compliance with Decision (D.) 22-12-055 (Phase 1 Decision).¹ The ESJ Plan provides a framework for engaging ESJ Communities, including tribal governments and organizations, during Phase 2 of Angeles Link and describes how SoCalGas's engagement strategies align with the goals of the California Public Utilities Commission's (Commission) ESJ Action Plan (CPUC ESJ Action Plan).

The ESJ Plan includes an ESJ community screening assessment (ESJ Screening), which provides baseline disadvantaged community (DAC) designation information and other demographic information for the approximately 1,300 miles of route configurations studied in Phase 1. Stakeholder feedback was instrumental in the development of the ESJ Plan. The total loaded cost associated with the ESJ Plan during Phase 1 is \$0.8 million in operating and maintenance (O&M) expenditures for Phase 1 activities.²

II. Study Costs

A combination of internal and external resources was utilized to execute the ESJ Plan. Direct costs recorded for these activities reflect labor costs (e.g., internal personnel) and non-labor costs (e.g., third-party contractors and miscellaneous costs

¹ Phase 1 Decision at 75 (Ordering Paragraphs (OP) 5(b)-(d)). The activities were scoped and conducted in compliance with the Phase 1 Decision in its entirety, which includes broader requirements than those required for cost recovery, including OP 6(I) (*id.* at 76). Phase 1 Decision OP 6 requirements to advance to Phase 2 are being addressed in A.24-12-011.

² Expenditures for these activities were incurred from January 2023 through December 2024, with some discrete trailing charges in 2025.



associated with supporting Angeles Link Phase 1 activities).³ Indirect costs reflect costs for overhead loaders.⁴ The total loaded cost for the ESJ Plan is \$0.8 million. Table 1 below provides additional cost details.

Table 1: ESJ Plan Total Costs (in millions)

Labor	Non-Labor	Overheads	Total Loaded Costs
\$0.1	\$0.6	\$0.1	\$0.8

A. Labor Costs

Labor costs for the ESJ Plan total \$0.1 million and consist of support from SoCalGas personnel within the Angeles Link organization (e.g., project managers and directors) as well as personnel from other departments such as general administration, regulatory and policy, and public affairs.⁵ The ESJ Plan was drafted by subject matter experts with DAC experience and solicited feedback through the stakeholder engagement process. Labor costs reflect weekly coordination meetings, plan development, including an iterative review process, and consideration and incorporation of stakeholder feedback where appropriate.

The majority of the ESJ Plan was developed internally by SoCalGas, leveraging the expertise and resources within the company. The ESJ Screening component was developed using a combination of internal expertise and external support (see Section II.B below). By utilizing mostly internal resources, SoCalGas avoided the added costs of hiring additional third-party contractors, while confirming the plan was developed with the company's operational context in mind.

³ See Chapter 1 (Direct Testimony of Shirley Arazi and Amy Kitson) for a description of miscellaneous costs.

⁴ See Chapter 6 (Direct Testimony of Jenny Chhuor and Michael W. Foster) for a description of the overhead costs.

⁵ See Chapter 1 (Direct Testimony of Shirley Arazi and Amy Kitson) for additional labor cost details.

B. Non-Labor Costs

Non-labor costs for the ESJ Plan total \$0.6 million and consist of third-party contractor costs and miscellaneous expenses.

SoCalGas retained Insignia Environmental (Insignia) for support with activities related to development of the ESJ Screening.⁶ The total amount spent by Insignia for the ESJ Screening work was approximately \$0.5 million. The ESJ Screening developed by Insignia involved an extensive desktop analysis of 1,300 miles of conceptual pipeline routes identified in the Routing Study. This desktop analysis included Geographic Information Systems (GIS) mapping to display ESJ communities and the collection of detailed socioeconomic data, such as population, household income, unemployment rate, and poverty levels.⁷ These comprehensive datasets provided valuable insights into the communities that Angeles Link could potentially traverse, supporting future stakeholder engagement and routing analysis efforts. The ESJ Screening was extensive, spanning hundreds of pages, highlighting the comprehensive and detailed nature of the work involved.

To support effective cost management throughout the development of the ESJ Screening, SoCalGas performed invoicing and budget management processes, aligning payments with project milestones to maintain financial discipline. Invoices were reviewed against completion benchmarks, confirming that payments were made only for work completed and verified. This approach provided transparency in expense tracking and helped prevent cost overruns.

⁶ See Chapter 4 (Direct Testimony and Workpaper of Jessica Kinnahan Foley) for Insignia contracting details.

⁷ DAC and ESJ Indicator Data was collected from the following sources: California Office of Environmental Health Hazard Assessment CalEnviroScreen, United States Climate Council on Environmental Quality Climate and Economic Justice Screening Tool (CEJST), and University of Southern California Community Development Index