

SCG-02-WP

Workpapers Supporting the Prepared Direct Testimony of  
Jason Legner

(Selected Projects)  
PUBLIC VERSION

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## Summary

Project ID	Estimated Annual Usage (therms)	Average Estimated Annual Lifecycle GHG Emission Reductions (metric tons of CO2e) (1)
A	89,941	2,377
B	120,000	3,172
C	580,450	15,343
D-1	1,402,572	37,075
D-2	525,964	13,903
E	1,277,342	33,765
F	2,170,646	57,378
G	251,520	6,649
H	300,000	7,930
Total	6,718,435	177,591

Footnote (1): Standard Lifecycle GHG Emission Reduction Methodology

Project ID - A - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEDE535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEDE535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	89,941	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$

**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
2,377	metric tons CO2e

Project ID - B - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	120,000	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$

**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
3,172	metric tons CO2e

Project ID - C - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	580,450	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$



**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
15,343	metric tons CO2e

Project ID - D-1 - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEDE535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEDE535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	1,402,572	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$

**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
37,075	metric tons CO2e

Project ID - D-2 - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	525,964	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$

Result

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
13,903	metric tons CO2e

Project ID - E - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	1,277,342	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$

**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
33,765	metric tons CO2e

Project ID - F - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	2,170,646	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$



**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
57,378	metric tons CO2e

Project ID - G - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	251,520	therms HHV	Customer Estimate

Calculation

$$Credits_{Bio-CNG}^{Diesel}(MT)$$
$$= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)}$$
$$\times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)}$$

**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
6,649	metric tons CO2e

Project ID - H - Standard Lifecycle GHG Emission Reduction Methodology

Inputs	Value	Units	Source
Carbon Intensity of Standard Diesel	100.45	gCO <sub>2</sub> e/MJ	Cal. Code. Regs. tit. 17 § 95484(c), Table 2 (n.4 [****]), available at: <a href="https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44">https://govt.westlaw.com/calregs/Document/I0AEED535A2111EC8227000D3A7C4BC3?listSource=Search&amp;contextData=(sc.Search)&amp;list=REGULATION_PUBLICVIEW&amp;rank=44</a> .
Volume Adjusted Average Carbon Intensity of Bio-CNG	-187.09	gCO <sub>2</sub> e/MJ	Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Energy Economy Ratio	0.9		Cal. Code. Regs. tit. 17 § 95486.1, Table 5 (CNG Spark-Ignition Engine), available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Energy Density Conversion Factor of CNG	105.5	MJ per therm	Cal. Code. Regs. tit. 17 § 95486(b)(1), Table 4, available at: <a href="https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/I0B3FBD735A2111EC8227000D3A7C4BC3?contextData=(sc.Default)</a> .
Higher Heating Value (HHV) to Lower Heating Value (LHV) Conversion Factor for CNG	0.903		Conversion factor (930 LHV)/(1030 HHV) from the LCFS Quarterly Data Spreadsheet (“Notes” worksheet). See LCFS Quarterly Data Spreadsheet as of Q3 2024, available at: <a href="https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx">https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx</a> .
Gram to Metric Ton Conversion Factor	1.00E-06	Metric ton per gram	Definition
Estimated Annual Energy Usage of RNG	300,000	therms HHV	Customer Estimate

Calculation

$$\begin{aligned} Credits_{Bio-CNG}^{Diesel}(MT) &= \left( 100.45 \frac{(gCO_2e)}{(MJ)} - \frac{-187.09 \frac{(gCO_2e)}{(MJ)}}{0.9} \right) \times E_{Bio-CNG}(therms\ HHV) \times 105.5 \frac{(MJ)}{(therms)} \\ &\quad \times \left( \frac{930\ LHV}{1030\ HHV} \right) \times 0.9 \times 1.0 \times 10^{-6} \frac{(MT)}{(gCO_2e)} \end{aligned}$$

**Result**

Average Estimated Annual Lifecycle GHG Emission Reductions	Units
7,930	metric tons CO2e

**Project A Customer Application Marked CONFIDENTIAL**

**Q1. Apply for the New Business Allowance Exception Application**

**Please fill out the information below to begin your New Business Allowance Exception Application. Responses must be completed in a single session as they cannot be saved. Once submitted, you will receive confirmation of your application receipt.**

**Q2.**

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

- (a) The project shows a demonstrable reduction in greenhouse gas emissions;
- (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and
- (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

*Disclaimer: SoCalGas' sole responsibility is to review all applications and submit qualifying projects to the CPUC for final approval or rejection. SoCalGas and/or the CPUC may require additional documentation or information to proceed with the application process. Per the CPUC, SoCalGas is only permitted to submit applications once per year, this means that the response timeline could vary greatly. Due to this, SoCalGas cannot provide any timeline for Gas Line Extension Allowances, Refunds, or Discount Exceptions.*

**Q3. Applicant information**

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name

Last name

**Q4. Business information**

Business name

**Q5. Please select your business use industry from the drop-down list below.**

**Q6. Is this project located within the state of California?**

☒ Yes

☐ No

Q7. Thank you for your submission. Unfortunately, your project is not located in California or within SoCalGas's territory. Therefore, we are unable to process your application at this time.  
Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

*This question was not displayed to the respondent.*

Q8. The following sections will help determine the eligibility of your exception application.

Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.

Q9. How does your project contribute to GHG reduction?

RNG trucks product significantly less GHG than traditional diesel trucks. Our facility installs 700 vehicles per year. On-site fuel station is required to fill the trucks at our location where we can perform required pressure test and perform functional test of the vehicles so we can deliver units to our customers. Each one of these 700 trucks run 6.5mpg on average 3005 tons of GHG. There are further significant reduction in GHG emissions as the trucks go through their lifecycle and most commonly use RNG fuel which has negative carbon intensity.

Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?

700 RNG trucks can save 3005 Short tons of GHG per year based on 650 miles run per truck vs traditional diesel trucks (source: Afleet calculator; unable to attached charted results). As mentioned earlier, the actual GHG reductions are much larger as most stations in CA supply RNG as fuel. Most of our customers would use diesel trucks as an alternative which would contribute or add significant GHG emissions.

Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?

☒ Yes

☐ No

Q12. See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)  
[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)  
[Argonne National Laboratory - Argonne GREET Model](#)

Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?

☒ Yes

☐ No

Q14. Please describe how the technology increases energy efficiency.

By transitioning fleets from typical diesel to natural gas (CNG/RNG)

Q15. What is this project's estimated energy reduction?

Unknown at this time

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

**Q16. Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)

[California Air Resource Board \(CARB\)](#)

[2022 Scoping Plan for Achieving Carbon Neutrality](#)

By promoting & accelerating adoption of clean burning Renewable natural gas.

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

☐ [Self-Generation Incentive Program](#)

☒ [Demand Side Grid Support](#)

☐ [Energy Efficiency](#)

☐ [Distributed Energy Resources Services Tariff](#)

☒ [Clean Transportation](#)

☐ Other program (please specify)

☐ None of the above

**Q19. To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

Supporting documents attached to So Cal Gas contact:

**Q21. Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of natural gas?**

☐ Yes

☒ No

**Q23. What other technology alternatives are available for your business or operation?**

We do not have an alternate option. Electric and hydrogen are not viable options for us.



**Q24. How would you operate your business if natural gas equipment was not available?**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

We would have to shut down or relocate our operation. We are in the business of [REDACTED] for heavy duty trucks. These solutions enable vehicles to reduce emissions throughout their life-cycle. They further offer business an economical solution towards a carbon negative future.

**Q25. What is your end use of natural gas?**

Pressurization, testing and operation of new CNG fueled vehicles for on-road use in Southern CA.

**Q26. Project location Information:**

**Please provide the project details.**

**Street address** (please provide unit number if applicable)

[REDACTED]

**City**

[REDACTED]

**County**

[REDACTED]

**Zip Code**

[REDACTED]

**E-mail address**

[REDACTED]

**Best contact phone number** (use this format: 000-000-0000)

[REDACTED]

**Q27. Air district for the project location:**

South Coast AQMD (Los Angeles County except for Antelope Valley AQMD, Orange, the western portion of San Bernardino and the western portion of Riverside counties) ▼

**Q28. Is this project located in a disadvantaged community?**

*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well as a high incidence of asthma and heart disease.*

To find out if your project is located in a Disadvantaged community, please click the link [here](#).

☐ Yes

☒ No

**Q29. Please provide the requested gas meter turn-on date for this project below.**

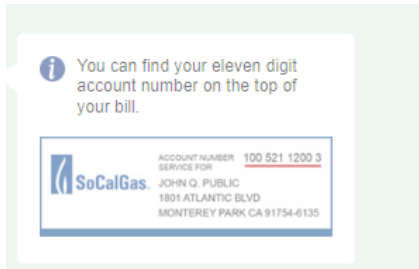
**Q30. Enter a date:**

10-01-2024

### Q31. Project Construction Status

- ☒ New  
☐ Existing

Q32. Please provide the customer account number/BAID (BAID; is a 11-digit number found at the top of your bill).



*This question was not displayed to the respondent.*

### Q33. Please list any equipment included in this project application.

Please list all new and existing natural gas equipment and load.

\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.

- ☒ Equipment 1 NGV Compressor  
☐ Equipment 2   
☐ Equipment 3   
☐ Equipment 4   
☐ Equipment 5

### Q34. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

	New or Existing	MBTU per Hour	End Use	# of units	# of operating hours per day (Not to exceed 24)	# of operating days per week	# of weeks per year (Not to exceed 52)
Approximately 700 trucks per annum @ 100 DGE	New ▾	6615	NGV/CNG/RNG ▾	1 ▾	12	7 ▾	52

### Q35. Please provide any additional project information you feel is pertinent to your application.

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D. D.21-09-020.

**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

**File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif**

**Uploaded files should not exceed 50MB each**

**Only one file is allowed per upload section**

[Payback\\_On-road\\_Export\(1\).xlsx](#)

35.9KB

application/vnd.openxmlformats-officedocument.spreadsheetml.sheet

**Q37.**

[GHG savings for 700 trucks.docx](#)

53.6KB

application/vnd.openxmlformats-officedocument.wordprocessingml.document

**Q38.**

**Q39.**

**Q40. You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.  
SUPPORTING DOCUMENT Project A Customer Application Marked CONFIDENTIAL

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: [EXTERNAL] Re: RE: [REDACTED] - Allowance Application Filing- Please respond asap!  
Date: Tuesday, June 10, 2025 11:18:23 AM  
Attachments: [image.png](#)  
[image.png](#)  
[image.png](#)  
[image.png](#)  
[image.png](#)  
[Screenshot of AFLEET.png](#)  
[Screenshot of AFLEET.png](#)  
[Screenshot of AFLEET.png](#)

**CAUTION! External Sender**

This email came from outside the company. If you're unsure whether this message is harmless, click the "Report Suspicious" button.

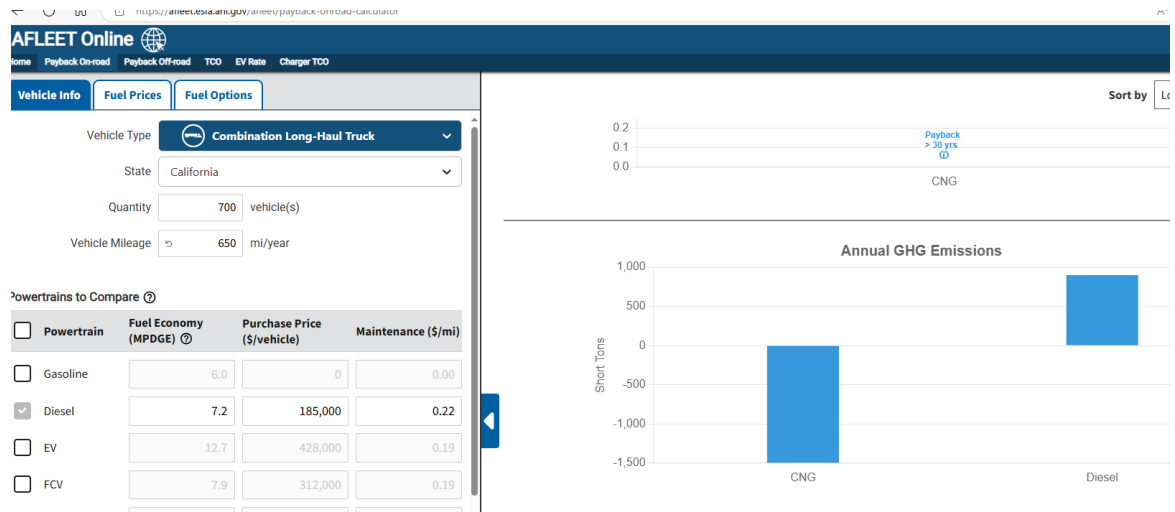
[Report Suspicious](#)

It seems there is a reference (25) in the 3005 short tons. I don't have that reference.

I just used AFLEET for 700 trucks @ 650 miles using RNG from Animal waste = 2392 tons of annual GHG emission savings.  
I'm not clear on what the details behind "using the more conservative Standard Lifecycle GHG Emission Reduction Methodology (as outlined in section I.A.a)", but the results (2378 metric tons) is very close to the AFLEET output. I'd recommend for simplicity just using the SoCal Gas method to avoid confusion.

There isn't anything in the rest of the application that appears incorrect to me.

Screenshot of AFLEET below.



**Project B Customer Application Marked CONFIDENTIAL**

**Q1. Apply for the New Business Allowance Exception Application**

**Please fill out the information below to begin your New Business Allowance Exception Application. Responses must be completed in a single session as they cannot be saved. Once submitted, you will receive confirmation of your application receipt.**

**Q2.**

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

(a) The project shows a demonstrable reduction in greenhouse gas emissions;

(b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and

(c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

*Disclaimer: SoCalGas' sole responsibility is to review all applications and submit qualifying projects to the CPUC for final approval or rejection. SoCalGas and/or the CPUC may require additional documentation or information to proceed with the application process. Per the CPUC, SoCalGas is only permitted to submit applications once per year, this means that the response timeline could vary greatly. Due to this, SoCalGas cannot provide any timeline for Gas Line Extension Allowances, Refunds, or Discount Exceptions.*

**Q3. Applicant information**

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name

Last name

**Q4. Business information**

Business name

**Q5. Please select your business use industry from the drop-down list below.**

**Q6. Is this project located within the state of California?**

☒ Yes

☐ No

Q7. Thank you for your submission. Unfortunately, your project is not located in California or within SoCalGas's territory. Therefore, we are unable to process your application at this time.

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

Q8. The following sections will help determine the eligibility of your exception application.

Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.

Q9. How does your project contribute to GHG reduction?

Compressed natural gas (CNG) used as a transportation fuel offers significant environmental benefits, particularly in reducing greenhouse gas emissions. CNG combustion produces fewer harmful pollutants and carbon dioxide compared to gasoline and diesel, contributing to cleaner air and lower overall carbon footprints. Furthermore, CNG vehicles emit substantially lower amounts of nitrogen oxides and particulate matter, helping to mitigate the adverse effects associated with conventional fossil fuels. Utilizing CNG is a practical and effective strategy for reducing greenhouse gas emissions, supporting a transition toward a more sustainable and eco-friendly transportation solutions.

Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?

Estimated annual GHG is approximately -1,000.624768 Tons of GHG compared to Diesel, This is calculated based on 6 Transit Buses over a one year prior. This figure is calculated using RNG Dairy Feedstock on the Afleet Calculator (<https://afleet.es.anl.gov/afleet/>). The total amount of vehicles using the proposed CNG station will be larger and thus increasing the overall GHG reduction. This station will supply CNG to the school district buses as well as a public fill dispenser component which will significant increase the GHG reduction. The use of Dairy RNG for CNG Powered vehicles helps create a negative GHG emission as RNG is used as a transportation fuel rather than releasing methane into the atmosphere.

Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?

☒ Yes

☐ No

Q12. See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)  
[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)  
[Argonne National Laboratory - Argonne GREET Model](#)

Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?

☒ Yes

☐ No

Q14. Please describe how the technology increases energy efficiency.

Cummins CNG engines use advanced combustion control strategies that ensure a high-efficiency burn of natural gas, reducing energy losses and maximizing power output while minimizing fuel consumption. High Thermal Efficiency: These engines are designed with components and configurations that enhance thermal efficiency, allowing more energy to be converted into work and less wasted as heat. Emission Reduction: Cummins CNG engines produce lower emissions of carbon dioxide (CO2) and pollutants such as nitrogen oxides (NOx) and particulate matter compared to diesel engines. The use of advanced aftertreatment systems helps further reduce emissions to meet stringent environmental standards. Durability and Reliability: Cummins has focused on engineering robust CNG engines that offer long service life and reliability, with components tailored to withstand the unique properties of natural gas. Integration of Advanced Technologies: Cummins CNG engines often incorporate features such as variable valve timing, turbocharging, and cooled exhaust gas recirculation (EGR) to boost performance and efficiency.

Q15. What is this project's estimated energy reduction?

n/a

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

Q16. Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).

Q17. How is your line extension project consistent with California's climate goals?

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)

[California Air Resource Board \(CARB\)](#)

[2022 Scoping Plan for Achieving Carbon Neutrality](#)

To support the transformation needed, we must build the clean energy production and distribution infrastructure for a carbon-neutral future. The solution will have to include transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes.

Q18. Does your project qualify for any of the following programs? (select all that apply)

☐ [Self-Generation Incentive Program](#)

☐ [Demand Side Grid Support](#)

☐ [Energy Efficiency](#)

☐ [Distributed Energy Resources Services Tariff](#)

☐ [Clean Transportation](#)

☐ Other program (please specify)

☒ None of the above

Q19. To learn more about California Energy Commission programs click [here](#).

Q20. What are your organization's sustainability goals?

the County of Climate Action Plan as a guide to achieve sustainability goals. Reference: chrome-extension://etaidnbmnnibpcajpcgclcfndmkaj/https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-2019-CAP-Update-Full.pdf

Q21. Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Q22. Are there any other feasible alternatives to the use of natural gas?

☐ Yes

☒ No

Q23. What other technology alternatives are available for your business or operation?

Existing City and school district buses are compressed natural gas (CNG) powered. While other technologies (e.g., hydrogen) are available, replacing the entire CNG bus fleets prior to their retirement age is not feasible.

**Q24. How would you operate your business if natural gas equipment was not available?**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

Vehicles would need to procure fuel at the nearest available retail CNG dispensing point or Mobile fueling where applicable. Current distances for CNG Dispensing are an average of 60 miles round trip; This adds both cost for paying retail CNG prices and time for travel between the retail fueling station and City/School District yards. Mobile Fueling is far more costly then driving to the nearest CNG Fuel station.

The [REDACTED] is building a CNG Station as a bridge Transportation fuel solution [REDACTED] has explored both Battery Electric Buses (BEB) and Infrastructure (Charging), as well as Hydrogen Fuel Cell Vehicles (FCV). We have determined both BEB and FCV buses are not a feasible option. Current BEB Technology requires long project lead times, the cost of both the vehicles and infrastructure are significantly more than CNG, Hydrogen is Vehicles are even more costly, with the added complexities of current poor supply chain for Hydrogen fuel; Which also uses CNG (Steam Methane Reforming) to produce Hydrogen.

**Q25. What is your end use of natural gas?**

Daily fueling of CNG powered City and school district buses and privately-owned CNG vehicles.

**Q26. Project location Information:**

**Please provide the project details.**

**Street address** (please provide unit number if applicable)

[REDACTED]

**City**

[REDACTED]

**County**

[REDACTED]

**Zip Code**

[REDACTED]

**E-mail address**

[REDACTED]

**Best contact phone number** (use this format: 000-000-0000)

[REDACTED]

**Q27. Air district for the project location:**

South Coast AQMD (Los Angeles County except for Antelope Valley AQMD, Orange, the western portion of San Bernardino and the western portion of Riverside counties) ▼

**Q28. Is this project located in a disadvantaged community?**

*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well as a high incidence of asthma and heart disease.*

To find out if your project is located in a Disadvantaged community, please click the link [here](#).

☒ Yes

☐ No

**Q29. Please provide the requested gas meter turn-on date for this project below.**

**Q30. Enter a date:**

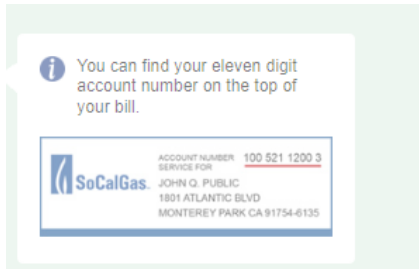
05-01-2025



### Q31. Project Construction Status

- ☒ New  
☐ Existing

Q32. Please provide the customer account number/BAID (BAID; is a 11-digit number found at the top of your bill).



*This question was not displayed to the respondent.*

### Q33. Please list any equipment included in this project application.

Please list all new and existing natural gas equipment and load.

\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.

- ☒ Equipment 1 CNG Compressor #1  
350 scfm
- ☒ Equipment 2 CNG Compressor #2  
350 scfm
- ☐ Equipment 3
- ☐ Equipment 4
- ☐ Equipment 5

### Q34. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

	New or Existing	MBTU per Hour	End Use	# of units	# of operating hours per day (Not to exceed 24)	# of operating days per week	# of weeks per year (Not to exceed 52)
CNG Compressor #1 350 scfm	New ▼	21,000 MBTU/Hr per compressor	NGV/CNG/RNG ▼	1 ▼	24	7 ▼	52
CNG Compressor #2 350 scfm	New ▼	21,000 MBTU/Hr per compressor	NGV/CNG/RNG ▼	1 ▼	24	7 ▼	52

### Q35. Please provide any additional project information you feel is pertinent to your application.

Public access to CNG vehicular fuel is a component of this project. Major credit cards will be accepted at the public CNG dispenser. The project site is easily accessible from Highway 10.

**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

**File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif**

**Uploaded files should not exceed 50MB each**

**Only one file is allowed per upload section**

[Portals-14-CAP-2019-2019-CAP-Update-Full.pdf](#)

3.1MB  
application/pdf

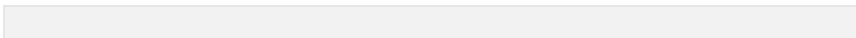
Q37.

Q38.

Q39.

**Q40. You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**



**Project C Customer Application Marked CONFIDENTIAL**

**Recipient Data:**

<b>Response ID</b>	R_6259w9cwUGmcoT8
<b>End Date</b>	2024-12-03T20:25:47Z
<b>IP Address</b>	

**Response Summary:**

**Apply for the New Business Allowance Exception Application**

**Please fill out the information below to begin your New Business Allowance Exception Application. Responses must be completed in a single session as they cannot be saved. Once submitted, you will receive confirmation of your application receipt.**

**Background:**

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

- (a) The project shows a demonstrable reduction in greenhouse gas emissions;
- (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and
- (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

*Disclaimer: SoCalGas' sole responsibility is to review all applications and submit qualifying projects to the CPUC for final approval or rejection. SoCalGas and/or the CPUC may require additional documentation or information to proceed with the application process. Per the CPUC, SoCalGas is only permitted to submit applications once per year, this means that the response timeline could vary greatly. Due to this, SoCalGas cannot provide any timeline for Gas Line Extension Allowances, Refunds, or Discount Exceptions.*

**Q3. Applicant information**

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name	
Last name	

**Q4. Business information**

Business name	
---------------	--

**Q5. Please select your business use industry from the drop-down list below.**

- Food Manufacturing

**Q6. Is this project located within the state of California?**

- Yes

The following sections will help determine the eligibility of your exception application.

**Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.**

**Q9. How does your project contribute to GHG reduction?**

Developing compressed natural gas (CNG) refueling infrastructure enables transportation fleets to utilize low-carbon intensity renewable natural gas (RNG). This fuel, both in the tank-to-wheel phase and on a well-to-wheel lifecycle basis, exhibits a lower greenhouse gas (GHG) carbon intensity (CI) in grams of CO<sub>2</sub> equivalent per megajoule (g CO<sub>2</sub>e/MJ) compared to ultra-low sulfur diesel. Specifically, RNG derived from dairy manure feedstock sourced from uncovered lagoons, which can supply to California's CNG station infrastructure, significantly mitigates GHG emissions within this approach not only addresses agricultural and land use sector emissions but also prevents fugitive methane emissions, resulting in a negative-carbon intensity RNG fuel that could provide.

**Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?**

When annually using 500,000 GGE of RNG at an average CI of 46.87 compared to an EER adjusted 450,000 GGE of fossil diesel fuel at 100.45 CI, this results in a 2,871 MT CO<sub>2</sub>e GHG reduction in emissions. When a CNG station uses a combination of landfill RBG and negative carbon intensity RNG from dairy manure feedstock with an average CI of -124.77, GHG reductions are furthered to 14,189 MT CO<sub>2</sub>e. If using a pure dairy RNG fuel at -250 CI, GHG reductions could be at 22,447 MT CO<sub>2</sub>e for this amount of fuel used.

**Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?**

- Yes

## See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)

[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)

[Argonne National Laboratory - Argonne GREET Model](#)

**Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?**

**Q15. What is this project's estimated energy reduction?**

Unknown

**Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)

[California Air Resource Board \(CARB\)](#)

[2022 Scoping Plan for Achieving Carbon Neutrality](#)

In 2022, California enacted Assembly Bill 1279, setting ambitious targets to reduce anthropogenic emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The transportation sector, which in 2023 contributed significantly to statewide emissions, is a key focus for these climate goals.

Our line extension project aligns with these objectives by providing RNG for vehicle fuel, a low-emission alternative that significantly reduces GHG emissions. The extension of the pipeline for RNG delivery to [REDACTED] can achieve a reportable reduction of over 90% in GHG emissions during the vehicle-use phase. Additionally, when RNG is sourced from in-state dairy manure projects, it further reduces GHG emissions in the agricultural sector.

While the primary focus is on GHG reductions, it's also important to note that using RNG in trucks reduces criteria pollutants like NOx, which are hazardous to health. By supporting the transition to cleaner energy sources in transportation, our project directly contributes to California's efforts to mitigate climate change, improve air quality, and promote environmental justice.

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

- [Clean Transportation](#)

**To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

[REDACTED] is a dedicated transportation partner for [REDACTED] committed to supporting their sustainability goals. [REDACTED] aims to increase the use of renewable energy in transportation, recognizing it as a crucial factor in reducing greenhouse gas emissions by 30% across their value chain. As a transportation partner, [REDACTED] is dedicated to increasing the use of low-carbon fuel options to help meet this target.

[REDACTED] understands that electrification may not be feasible for all transportation needs and continues to explore opportunities to decarbonize their Scope 3 transportation emissions. This includes looking at the use of low-carbon fuels. [REDACTED] aligns with this vision by actively seeking and implementing sustainable fuel options, including RNG, to significantly reduce reliance on fossil fuels.

**Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of natural gas?**

- No

**Q23. What other technology alternatives are available for your business or operation?**

EV Trucks current lack the range necessary to accommodate our routes. Additionally, the hydrogen infrastructure and trucks are not sufficiently developed for us to commit to these technologies currently.

**Q24. How would you operate your business if natural gas equipment was not available?**

In the absence of available natural gas equipment, we would opt for diesel trucks that adhere to the standards set by the California Air Resources Board and the Environmental Protection Agency. These trucks would be powered by renewable diesel, ensuring compliance with regulatory requirements while supporting our commitment to reducing greenhouse gas emissions.

**Q25. What is your end use of natural gas?**

Our new CNG station will be accessible to the public and serve as a fueling hub for our natural gas truck fleet. This station will be exclusively supplied with 100% RNG, enabling both our fleet and third-party customers to actively participate in reducing greenhouse gas emissions. With an anticipated annual throughput of approximately 500,000 gasoline gallon equivalents, this station represents a significant step forward in our commitment to sustainability and environmental stewardship. By providing a reliable source of RNG, we are supporting California's ambitious GHG reduction goals and advancing towards a cleaner future for all.

**Q26. Project location Information:**

**Please provide the project details.**

<b>Street address (please provide unit number if applicable)</b>	
<b>City</b>	
<b>County</b>	
<b>Zip Code</b>	
<b>E-mail address</b>	
<b>Best contact phone number (use this format: 000-000-0000)</b>	

**Q27. Air district for the project location:**

- Mojave Desert AQMD (Northern portion of San Bernardino County, eastern portion of Riverside County)

Q28.

***Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well a high incidence of asthma and heart disease.***

***To find out if your project is located in a Disadvantaged community, please click the link [here](#).***

- Yes

**Please provide the requested gas meter turn-on date for this project below.**

**Q30. Enter a date:**  
08-04-2025

**Q31. Project Construction Status**

- New

**Q33. Please list any equipment included in this project application.**  
**Please list all new and existing natural gas equipment and load.**

**\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.**

- Equipment 1:  
CNG Compressor #1
- Equipment 2:  
CNG Compressor #2
- Equipment 3:  
Gas Storage Vessels
- Equipment 4:  
Gas Dryer

**Q34#1. Please provide the information requested for each piece of equipment you stated.**

***Existing* equipment includes any natural gas equipment currently at your project site. *New* equipment includes any natural gas equipment you plan to install that is not currently at your project site.**  
**- New or Existing**

<b><i>Equipment 1</i></b>	New
<b><i>Equipment 2</i></b>	New
<b><i>Equipment 3</i></b>	New
<b><i>Equipment 4</i></b>	New

Q34

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- MBTU per Hour

<b>Equipment 1</b>	37580
<b>Equipment 2</b>	37580
<b>Equipment 3</b>	0
<b>Equipment 4</b>	0
<b>Equipment 5</b>	N/A

Q34#3. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- End Use

<b>Equipment 1</b>	NGV/CNG/RNG
<b>Equipment 2</b>	NGV/CNG/RNG
<b>Equipment 3</b>	NGV/CNG/RNG
<b>Equipment 4</b>	NGV/CNG/RNG

Q34#4. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- # of units

<b>Equipment 1</b>	1
<b>Equipment 2</b>	1
<b>Equipment 3</b>	1
<b>Equipment 4</b>	1

Q34#5. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- # of operating hours per day (Not to exceed 24)

<b>Equipment 1</b>	24
<b>Equipment 2</b>	24
<b>Equipment 3</b>	24
<b>Equipment 4</b>	24
<b>Equipment 5</b>	N/A

Q34#6. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- # of operating days per week

<b>Equipment 1</b>	7
<b>Equipment 2</b>	7
<b>Equipment 3</b>	7
<b>Equipment 4</b>	7



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**Q34#7. Please provide the information requested for each piece of equipment you stated.**

*Existing* equipment includes any natural gas equipment currently at your project site. *New* equipment includes any natural gas equipment you plan to install that is not currently at your project site.  
- # of weeks per year (Not to exceed 52)

<i>Equipment 1</i>	52
<i>Equipment 2</i>	52
<i>Equipment 3</i>	52
<i>Equipment 4</i>	52
<i>Equipment 5</i>	N/A

**Q35. Please provide any additional project information you feel is pertinent to your application.**

N/A

**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

**File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif**

**Uploaded files should not exceed 50MB each**

**Only one file is allowed per upload section**

N/A

**Q37.**

N/A

**Q38.**

N/A

**Q39.**

N/A

**You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**

**Project D1 Customer Application Marked CONFIDENTIAL**

**Q1. Apply for the New Business Allowance Exception Application**

**Please fill out the information below to begin your New Business Allowance Exception Application. Responses must be completed in a single session as they cannot be saved. Once submitted, you will receive confirmation of your application receipt.**

**Q2.**

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

(a) The project shows a demonstrable reduction in greenhouse gas emissions;

(b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and

(c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

*Disclaimer: SoCalGas' sole responsibility is to review all applications and submit qualifying projects to the CPUC for final approval or rejection. SoCalGas and/or the CPUC may require additional documentation or information to proceed with the application process. Per the CPUC, SoCalGas is only permitted to submit applications once per year, this means that the response timeline could vary greatly. Due to this, SoCalGas cannot provide any timeline for Gas Line Extension Allowances, Refunds, or Discount Exceptions.*

**Q3. Applicant information**

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name

Last name

**Q4. Business information**

Business name

**Q5. Please select your business use industry from the drop-down list below.**

**Q6. Is this project located within the state of California?**

☒ Yes

☐ No

Q7. Thank you for your submission. Unfortunately, your project is not located in California or within SoCalGas's territory. Therefore, we are unable to process your application at this time.

*This question was not displayed to the respondent.*

Q8. The following sections will help determine the eligibility of your exception application.

Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.

Q9. How does your project contribute to GHG reduction?

By using Renewable Natural Gas (RNG) in our refuse collection vehicles we will reduce the GHG emissions by over 80%.

Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?

The annual GHG emissions are over 80% lower for the refuse trucks using RNG and the tons of GHG reduced per year would be around 5 billion tons.

Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?

☒ Yes

☐ No

Q12. See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)  
[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)  
[Argonne National Laboratory - Argonne GREET Model](#)

Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?

☒ Yes

☐ No

Q14. Please describe how the technology increases energy efficiency.

The use of RNG contributes to a Circular Economy by removing organic waste from landfills and reusing the methane and compost created here in the State of California.

Q15. What is this project's estimated energy reduction?

The use of RNG is a significant energy reduction compared to the use of diesel fuel.

**Q16. Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)  
[California Air Resource Board \(CARB\)](#)  
[2022 Scoping Plan for Achieving Carbon Neutrality](#)

This project reduces methane emissions significantly in accordance with SB 32, CARBS policies and rules, and with the 2022 Scoping Plan

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

- ☐ [Self-Generation Incentive Program](#)
- ☐ [Demand Side Grid Support](#)
- ☐ [Energy Efficiency](#)
- ☐ [Distributed Energy Resources Services Tariff](#)

☒ [Clean Transportation](#)

☐ Other program (please specify)

☐ None of the above

**Q19. To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

To completely eliminate the use of diesel fuel in our on road transportation fleet by 2040.

**Q21. Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of natural gas?**

- ☐ Yes
- ☒ No

**Q23. What other technology alternatives are available for your business or operation?**

the only r feasible technology is diesel engines.

**Q24. How would you operate your business if natural gas equipment was not available?**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

We would have to continue using diesel fuel in out trash collection vehicles.

**Q25. What is your end use of natural gas?**

As a transportation fuel for our refuse collection truck fleet.

**Q26. Project location Information:**

**Please provide the project details.**

**Street address** (please provide unit number if applicable)

**City**

**County**

**Zip Code**

**E-mail address**

**Best contact phone number** (use this format: 000-000-0000)

**Q27. Air district for the project location:**

Imperial County APCD (all of Imperial County)

**Q28. Is this project located in a disadvantaged community?**

*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well a high incidence of asthma and heart disease.*

To find out if your project is located in a Disadvantaged community, please click the link [here](#).

☒ Yes

☐ No

**Q29. Please provide the requested gas meter turn-on date for this project below.**

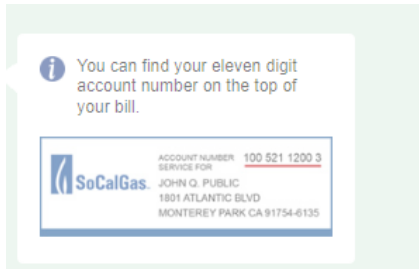
**Q30. Enter a date:**

12-15-2025

### Q31. Project Construction Status

- ☒ New
- ☐ Existing

Q32. Please provide the customer account number/BAID (BAID; is a 11-digit number found at the top of your bill).



*This question was not displayed to the respondent.*

### Q33. Please list any equipment included in this project application.

Please list all new and existing natural gas equipment and load.

\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.

- ☒ Equipment 1 CNG re-fueling station
- ☐ Equipment 2
- ☐ Equipment 3
- ☐ Equipment 4
- ☐ Equipment 5

### Q34. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

	New or Existing	MBTU per Hour	End Use	# of units	# of operating hours per day (Not to exceed 24)	# of operating days per week	# of weeks per year (Not to exceed 52)
CNG re-fueling station	New ▼	750	NGV/CNG/RNG ▼	More than 10 ▼	24	7 ▼	52

### Q35. Please provide any additional project information you feel is pertinent to your application.

This is a refuse truck refueling project that will use Renewable Natural Gas instead of diesel fuels. Our company

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

**File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif**

**Uploaded files should not exceed 50MB each**

**Only one file is allowed per upload section**

Q37.

Q38.

Q39.

**Q40. You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**

**Project D2 Customer Application Marked CONFIDENTIAL**

**Q1. Apply for the New Business Allowance Exception Application**

**Please fill out the information below to begin your New Business Allowance Exception Application. Responses must be completed in a single session as they cannot be saved. Once submitted, you will receive confirmation of your application receipt.**

**Q2.**

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

(a) The project shows a demonstrable reduction in greenhouse gas emissions;

(b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and

(c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

*Disclaimer: SoCalGas' sole responsibility is to review all applications and submit qualifying projects to the CPUC for final approval or rejection. SoCalGas and/or the CPUC may require additional documentation or information to proceed with the application process. Per the CPUC, SoCalGas is only permitted to submit applications once per year, this means that the response timeline could vary greatly. Due to this, SoCalGas cannot provide any timeline for Gas Line Extension Allowances, Refunds, or Discount Exceptions.*

**Q3. Applicant information**

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name

Last name

**Q4. Business information**

Business name

**Q5. Please select your business use industry from the drop-down list below.**

**Q6. Is this project located within the state of California?**

☒ Yes

☐ No



Q7. Thank you for your submission. Unfortunately, your project is not located in California or within SoCalGas's territory. Therefore, we are unable to process your application at this time.

*This question was not displayed to the respondent.*

Q8. The following sections will help determine the eligibility of your exception application.

Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.

Q9. How does your project contribute to GHG reduction?

reduces diesel emission pollution

Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?

about 60,000 metric tons of GHG reduction

Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?

☒ Yes

☐ No

Q12. See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)  
[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)  
[Argonne National Laboratory - Argonne GREET Model](#)

Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?

☒ Yes

☐ No

Q14. Please describe how the technology increases energy efficiency.

this project will use RNG fuel that is repurposing, bad methane

Q15. What is this project's estimated energy reduction?

This is energy reduction in diesel carbon.

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

**Q16. Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)

[California Air Resource Board \(CARB\)](#)

[2022 Scoping Plan for Achieving Carbon Neutrality](#)

clean air emissions reduction

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

☐ [Self-Generation Incentive Program](#)

☐ [Demand Side Grid Support](#)

☐ [Energy Efficiency](#)

☐ [Distributed Energy Resources Services Tariff](#)

☒ [Clean Transportation](#)

☐ Other program (please specify)

☐ None of the above

**Q19. To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

we are continuing to lower our diesel footprint and also we have [REDACTED]

**Q21. Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of natural gas?**

☐ Yes

☒ No

**Q23. What other technology alternatives are available for your business or operation?**

the diesel would be the only alternative depending on how far we have to go

**Q24. How would you operate your business if natural gas equipment was not available?**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

we would have to use diesel powered trucks

**Q25. What is your end use of natural gas?**

RNG fuel and using natural gas to power. Our trucks picking up waste all over California.

**Q26. Project location Information:**

**Please provide the project details.**

**Street address** (please provide unit number if applicable)

**City**

**County**

**Zip Code**

**E-mail address**

**Best contact phone number** (use this format: 000-000-0000)

**Q27. Air district for the project location:**

South Coast AQMD (Los Angeles County except for Antelope Valley AQMD, Orange, the western portion of San Bernardino and the western portion of Riverside counties) ▼

**Q28. Is this project located in a disadvantaged community?**

*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well a high incidence of asthma and heart disease.*

To find out if your project is located in a Disadvantaged community, please click the link [here](#).

☐ Yes

☒ No

**Q29. Please provide the requested gas meter turn-on date for this project below.**

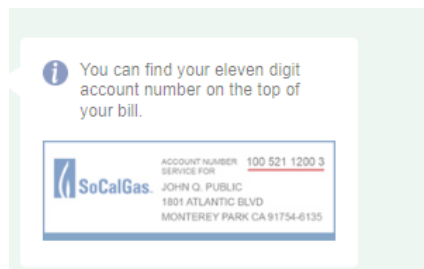
**Q30. Enter a date:**

06-19-2025

### Q31. Project Construction Status

- ☒ New  
☐ Existing

Q32. Please provide the customer account number/BAID (BAID; is a 11-digit number found at the top of your bill).



*This question was not displayed to the respondent.*

Q33. Please list any equipment included in this project application.

Please list all new and existing natural gas equipment and load.

\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.

- ☒ Equipment 1 CNG compressor  
☒ Equipment 2 CNG compressor  
☒ Equipment 3 CNG compressor  
☐ Equipment 4  
☐ Equipment 5

Q34. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

	New or Existing	MBTU per Hour	End Use	# of units	# of operating hours per day (Not to exceed 24)	# of operating days per week	# of weeks per year (Not to exceed 52)
CNG compressor	New ▾	4300	NGV/CNG/RNG ▾	More than 10 ▾	6	5 ▾	52
CNG compressor	New ▾	4300	NGV/CNG/RNG ▾	More than 10 ▾	6	5 ▾	52
CNG compressor	New ▾	4300	NGV/CNG/RNG ▾	More than 10 ▾	3	5 ▾	52

Q35. Please provide any additional project information you feel is pertinent to your application.

**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

**File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif**

**Uploaded files should not exceed 50MB each**

**Only one file is allowed per upload section**

**Q37.**

**Q38.**

**Q39.**

**Q40. You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**

**Supporting Document for Project E and F Marked CONFIDENTIAL**

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] RE: [REDACTED] NB Allowance Exception  
**Date:** Thursday, February 27, 2025 10:50:12 AM  
**Attachments:** [image.png](#)  
[image.png](#)  
[image.png](#)  
[image.png](#)  
[image.png](#)  
[image.png](#)

**CAUTION! External Sender**

This email came from outside the company. If you're unsure whether this message is harmless, click the "Report Suspicious" button.

[Report Suspicious](#)

Will this info Work.

Carbon Reduction using RNG Supply from Landfills vs. Diesel (Source: CARB LCFS: Section 95486.1(a)(1))	
Year 1 Metric tonnes reduction for fleet	5,451
5 Year Metric tonnes reduction for fleet	27,254
7 Year Metric tonnes reduction for fleet	38,155
10 Year Metric tonnes reduction for fleet	54,507

[REDACTED]  
[REDACTED]  
[REDACTED]  
[m](#)

#### Q1. Apply for the New Business Allowance Exception Application

Please fill out the information below to begin your New Business Allowance Exception Application. **Responses must be completed in a single session as they cannot be saved.** Once submitted, you will receive confirmation of your application receipt.

#### Q2.

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

- (a) The project shows a demonstrable reduction in greenhouse gas emissions;
- (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and
- (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

*Disclaimer: SoCalGas' sole responsibility is to review all applications and submit qualifying projects to the CPUC for final approval or rejection. SoCalGas and/or the CPUC may require additional documentation or information to proceed with the application process. Per the CPUC, SoCalGas is only permitted to submit applications once per year, this means that the response timeline could vary greatly. Due to this, SoCalGas cannot provide any timeline for Gas Line Extension Allowances, Refunds, or Discount Exceptions.*

#### Q3. Applicant information

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name

Last name

#### Q4. Business information

Business name

#### Q5. Please select your business use industry from the drop-down list below.

#### Q6. Is this project located within the state of California?

☒ Yes

☐ No

Q7. Thank you for your submission. Unfortunately, your project is not located in California or within SoCalGas's territory. Therefore, we are unable to process your application at this time.

*This question was not displayed to the respondent.*

Q8. The following sections will help determine the eligibility of your exception application.

Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.

Q9. How does your project contribute to GHG reduction?

this project will be using RNG fuel, lowering diesel carbon emissions.  
Our project reduces GHG emissions by replacing diesel with Renewable Natural Gas (RNG), a low-carbon fuel derived from organic waste. RNG-powered heavy-duty trucks and buses significantly cut emissions, with RNG having a carbon intensity as low as -300 gCO<sub>2</sub>e/MJ. By preventing methane release and displacing diesel, RNG helps decarbonize transportation.

Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?

The project reduces 20k metric tons of CO<sub>2</sub>e annually. This is based on 30 vehicles, each driving 60k miles per year, replacing diesel with RNG, which has a lower carbon intensity. Supporting calculations are attached.

Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?

☒ Yes

☐ No

Q12. See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)  
[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)  
[Argonne National Laboratory - Argonne GREET Model](#)

Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?

☐ Yes

☒ No

Q14. Please describe how the technology increases energy efficiency.

N/A

Q15. What is this project's estimated energy reduction?



N/A

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

**Q16. Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)

[California Air Resource Board \(CARB\)](#)

[2022 Scoping Plan for Achieving Carbon Neutrality](#)

The project supports California's climate goals by expanding RNG infrastructure, reducing GHG emissions, and providing a low-carbon alternative to diesel. If a public station, it enables wider clean fuel adoption, aligning with the LCFS and Clean Fleet rules.

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

☐ [Self-Generation Incentive Program](#)

☐ [Demand Side Grid Support](#)

☐ [Energy Efficiency](#)

☐ [Distributed Energy Resources Services Tariff](#)

☒ [Clean Transportation](#)

☐ Other program (please specify)

☐ None of the above

**Q19. To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

██████████ aims to decarbonize transportation by expanding RNG production, reducing methane emissions, and supporting clean energy solutions. We invest in waste-to-energy projects, clean fuel infrastructure, and renewable power generation to drive sustainability

**Q21. Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of natural gas?**

☐ Yes

☒ No

**Q23. What other technology alternatives are available for your business or operation?**

Diesel alternatives like BEVs and FCEVs are not yet viable for heavy-duty trucking due to high costs, infrastructure gaps, range limits, and long refueling times. RNG offers an immediate, scalable, and cost-effective solution for fleet decarbonization.

**Q24. How would you operate your business if natural gas equipment was not available?**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

we would use diesel trucks

**Q25. What is your end use of natural gas?**

our goal is to continue to transfer our fleet into CNG truck using RNG fuel to lower emissions

**Q26. Project location Information:**

**Please provide the project details.**

**Street address** (please provide unit number if applicable)

**City**

**County**

**Zip Code**

**E-mail address**

**Best contact phone number** (use this format: 000-000-0000)

**Q27. Air district for the project location:**

South Coast AQMD (Los Angeles County except for Antelope Valley AQMD, Orange, the western portion of San Bernardino and the western portion of Riverside counties) ▼

**Q28. Is this project located in a disadvantaged community?**

*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well a high incidence of asthma and heart disease.*

*To find out if your project is located in a Disadvantaged community, please click the link [here](#).*

☒ Yes

☐ No

**Q29. Please provide the requested gas meter turn-on date for this project below.**

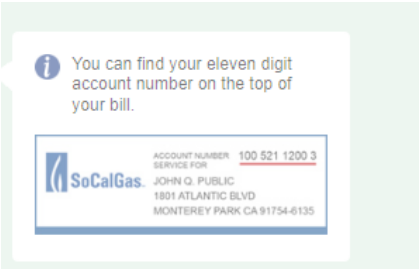
**Q30. Enter a date:**

08-14-2025

Q31. Project Construction Status

- ☒ New
- ☐ Existing

Q32. Please provide the customer account number/BAID (BAID; is a 11-digit number found at the top of your bill).



This question was not displayed to the respondent.

Q33. Please list any equipment included in this project application.

Please list all new and existing natural gas equipment and load.

\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.

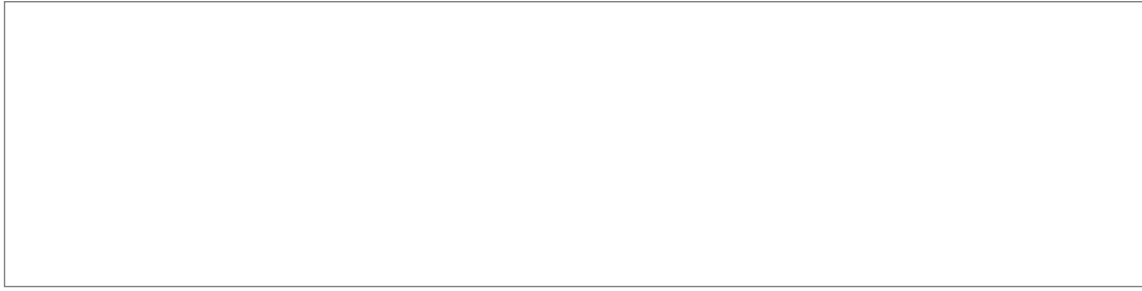
- ☒ Equipment 1 CNG compressor
- ☒ Equipment 2 CNG compressor
- ☐ Equipment 3
- ☐ Equipment 4
- ☐ Equipment 5

Q34. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

	New or Existing	MBTU per Hour	End Use	# of units	# of operating hours per day (Not to exceed 24)	# of operating days per week	# of weeks per year (Not to exceed 52)
CNG compressor	New	28000	NGV/CNG/RNG	More than 10	4	5	52
CNG compressor	New	28000	NGV/CNG/RNG	More than 10	4	5	52

Q35. Please provide any additional project information you feel is pertinent to your application.



**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

**File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif**

**Uploaded files should not exceed 50MB each**

**Only one file is allowed per upload section**

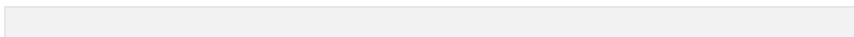
Q37.

Q38.

Q39.

**Q40. You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**



#### Q1. Apply for the New Business Allowance Exception Application

Please fill out the information below to begin your New Business Allowance Exception Application. **Responses must be completed in a single session as they cannot be saved.** Once submitted, you will receive confirmation of your application receipt.

#### Q2.

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

- (a) The project shows a demonstrable reduction in greenhouse gas emissions;
- (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and
- (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

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#### Q3. Applicant information

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name

Last name

#### Q4. Business information

Business name

#### Q5. Please select your business use industry from the drop-down list below.

#### Q6. Is this project located within the state of California?

☒ Yes

☐ No

Q7. Thank you for your submission. Unfortunately, your project is not located in California or within SoCalGas's territory. Therefore, we are unable to process your application at this time.

*This question was not displayed to the respondent.*

Q8. The following sections will help determine the eligibility of your exception application.

Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.

Q9. How does your project contribute to GHG reduction?

our project reduces GeG emissions by replacing diesel with Renewable Natural Gas (RNG), a low-carbon fuel derived from organic waste. RNG-powered heavy-duty trucks and buses significantly cut emissions, with RNG having a carbon intensity as low as -3MM gCl<sub>2</sub>e/LMJ. y preventing methane release and displacing diesel, RNG helps carbonize transportation

Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?

The project reduces 5853 metric tons of Cl<sub>2</sub>e annually. This is based on 60vehicles, each driving [u] miles per year, replacing diesel with RNG, which has a lower carbon intensity. Supporting calculations are attached.

Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?

☐ Yes

☒ No

Q12. See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)

[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)

[Argonne National Laboratory - Argonne GREET Model](#)

Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?

☒ Yes

☐ No

Q14. Please describe how the technology increases energy efficiency.

Not applicable..

Q15. What is this project's estimated energy reduction?

**Q16. Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)  
[California Air Resource Board \(CARB\)](#)  
[2022 Scoping Plan for Achieving Carbon Neutrality](#)

The project supports California's climate goals by expanding RNG infrastructure, reducing GHG emissions, and providing a low-carbon alternative to diesel. If a public station, it enables wider clean fuel adoption, aligning with the LCFS and Clean Fleet rules.

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

- ☐ [Self-Generation Incentive Program](#)
- ☐ [Demand Side Grid Support](#)
- ☐ [Energy Efficiency](#)
- ☐ [Distributed Energy Resources Services Tariff](#)
- ☒ [Clean Transportation](#)
- ☒ Other program (please specify)
- ☐ None of the above

**Q19. To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

we aims to decarbonize transportation by expanding RNG production, reducing methane emissions, and supporting clean energy solutions. We invest in waste-to-energy projects, clean fuel infrastructure, and renewable power generation to drive sustainability.

**Q21. Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of natural gas?**

- ☐ Yes
- ☒ No

**Q23. What other technology alternatives are available for your business or operation?**

Diesel alternatives like BEVs and FCEVs are not yet viable for heavy-duty trucking due to high costs, infrastructure gaps, range limits, and long refueling times. RNG offers an immediate, scalable, and cost-effective solution for fleet decarbonization.

**Q24. How would you operate your business if natural gas equipment was not available?**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

using diesel fuel

**Q25. What is your end use of natural gas?**

To power our fleet of trucks.

**Q26. Project location Information:**

**Please provide the project details.**

**Street address** (please provide unit number if applicable)

**City**

**County**

**Zip Code**

**E-mail address**

**Best contact phone number** (use this format: 000-000-0000)

**Q27. Air district for the project location:**

Imperial County APCD (all of Imperial County)

**Q28. Is this project located in a disadvantaged community?**

*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well as a high incidence of asthma and heart disease.*

*To find out if your project is located in a Disadvantaged community, please click the link [here](#).*

☒ Yes

☐ No

**Q29. Please provide the requested gas meter turn-on date for this project below.**

**Q30. Enter a date:**

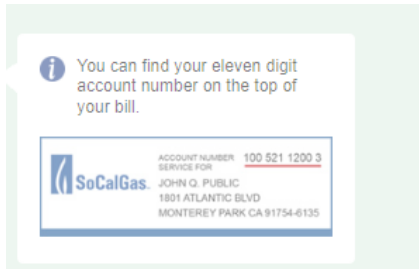
07-31-2025



### Q31. Project Construction Status

- ☒ New  
☐ Existing

Q32. Please provide the customer account number/BAID (BAID; is a 11-digit number found at the top of your bill).



*This question was not displayed to the respondent.*

### Q33. Please list any equipment included in this project application.

Please list all new and existing natural gas equipment and load.

\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.

- ☒ Equipment 1 CNG Compressor  
☒ Equipment 2 CNG Compressor  
☐ Equipment 3  
☐ Equipment 4  
☐ Equipment 5

### Q34. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

	New or Existing	MBTU per Hour	End Use	# of units	# of operating hours per day (Not to exceed 24)	# of operating days per week	# of weeks per year (Not to exceed 52)
CNG Compressor	New ▼	43,878	NGV/CNG/RNG ▼	More than 10 ▼	7	5 ▼	52
CNG Compressor	New ▼	43,878	NGV/CNG/RNG ▼	More than 10 ▼	7	5 ▼	52

### Q35. Please provide any additional project information you feel is pertinent to your application.

**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

**File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif**

**Uploaded files should not exceed 50MB each**

**Only one file is allowed per upload section**

Q37.

Q38.

Q39.

**Q40. You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.  
Project G Customer Application Marked CONFIDENTIAL

**Q1. Apply for the New Business Allowance Exception Application**

**Please fill out the information below to begin your New Business Allowance Exception Application. Responses must be completed in a single session as they cannot be saved. Once submitted, you will receive confirmation of your application receipt.**

**Q2.**

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

- (a) The project shows a demonstrable reduction in greenhouse gas emissions;
- (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and
- (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

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**Q3. Applicant information**

Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.

First name

Last name

**Q4. Business information**

Business name

**Q5. Please select your business use industry from the drop-down list below.**

Other (Example: Non-chain Restaurant, Laundromat, etc.) ▼

**Q6. Is this project located within the state of California?**

☒ Yes

☐ No

Q7. Thank you for your submission. Unfortunately, your project is not located in California or within SoCalGas's territory. Therefore, we are unable to process your application at this time.

*This question was not displayed to the respondent.*

Q8. The following sections will help determine the eligibility of your exception application.

Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.

Q9. How does your project contribute to GHG reduction?

The project will offer alternative fuels such as renewable bio diesel, CNG, as well as offering Electric Vehicle Charging Stations. This alternative to traditional fuels helps in reducing the amount of GHG.

Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?

CNG use reduces GHG emissions by 20% compared to gasoline and biodiesel use reduces GHG emissions by 74% compared to petroleum diesel. That would be a reduction of 178 MT CO<sub>2</sub>e per 100,000 gallons of CNG and 753 MT CO<sub>2</sub>e per 100,000 gallons of biodiesel. (project totals)

Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?

☐ Yes

☒ No

Q12. See list below for additional greenhouse gas emission resources:

[Environmental Protection Agency](#)  
[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies](#)  
[Argonne National Laboratory - Argonne GREET Model](#)

Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?

☒ Yes

☐ No

Q14. Please describe how the technology increases energy efficiency.

It's not necessarily the technology that's more energy efficient, it's the presence of offering alternative fuels to the customers. The more places that offer alternative fuels, the better the infrastructure to encourage more people to purchase vehicles that use alternative fuels.

Q15. What is this project's estimated energy reduction?

As mentioned previously, CNG use reduces GHG emissions by 20% compared to gasoline and biodiesel use reduces GHG emissions by 74% compared to petroleum diesel. That would be a reduction of 178 MT CO<sub>2</sub>e per 100,000 gallons of CNG and 753 MT CO<sub>2</sub>e per 100,000 gallons of biodiesel. (project totals)

**Q16. Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

See list below for a few helpful hyperlinks regarding California's climate goals:

[Senate Bill 32 California Global Warming Solutions Act of 2006](#)  
[California Air Resource Board \(CARB\)](#)  
[2022 Scoping Plan for Achieving Carbon Neutrality](#)

California's SB 32's goal is to reduce GHG emissions by 40% between the years 1990 and 2030. By offering alternative fuels, we are contributing to a growing infrastructure by providing nearby residents and those traveling along Hwy 60 another place to support their alternative fueled vehicle. Alternative fuels are proven to have a much lower GHG output than traditionally fueled vehicles.

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

☐ [Self-Generation Incentive Program](#)

☒ [Demand Side Grid Support](#)

☐ [Energy Efficiency](#)

☐ [Distributed Energy Resources Services Tariff](#)

☐ [Clean Transportation](#)

☒ Other program (please specify)

The "Energy Efficiency" and "Clean Transportation" web page links don't work so I can't verify if they apply to this project

☐ None of the above

**Q19. To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

To continue to provide alternative fueling options for customers and expanding its infrastructure network.

**Q21. Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of natural gas?**

☒ Yes

☐ No

**Q23. What other technology alternatives are available for your business or operation?**

Outside of CNG, we're offering E85, Biodiesel, and Electric Vehicle Charging Stations

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, and D.21-09-020.

**Q24. How would you operate your business if natural gas equipment was not available?**

We're very thankful that Natural Gas is available to the site. It would be much more expensive to heat the buildings we have and would also limit a critical alternative we want to offer to our customers.

**Q25. What is your end use of natural gas?**

To provide CNG to customers to fuel their vehicle. Many government owned vehicles currently use CNG now and we want to provide another place where they can refuel as well.

**Q26. Project location Information:**

**Please provide the project details.**

**Street address** (please provide unit number if applicable)

[REDACTED]

**City**

[REDACTED]

**County**

[REDACTED]

**Zip Code**

[REDACTED]

**E-mail address**

[REDACTED]

**Best contact phone number** (use this format: 000-000-0000)

[REDACTED]

**Q27. Air district for the project location:**

South Coast AQMD (Los Angeles County except for Antelope Valley AQMD, Orange, the western portion of San Bernardino and the western portion of Riverside counties) ▼

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*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well a high incidence of asthma and heart disease.*

To find out if your project is located in a Disadvantaged community, please click the link [here](#).

☒ Yes

☐ No

**Q29. Please provide the requested gas meter turn-on date for this project below.**

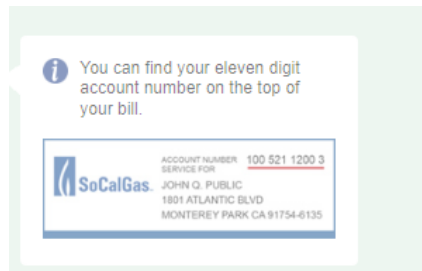
Q30. Enter a date:

01-01-2026

Q31. Project Construction Status

- ☒ New  
☐ Existing

Q32. Please provide the customer account number/BAID (BAID; is a 11-digit number found at the top of your bill).



This question was not displayed to the respondent.

Q33. Please list any equipment included in this project application.

Please list all new and existing natural gas equipment and load.

\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.

- ☒ Equipment 1 CNG Compressor #1  
32.33 MMBtu  
☒ Equipment 2 CNG Compressor #2  
32.33 MMBtu  
☒ Equipment 3 CNG Compressor #3  
(FUTURE) 32.33 MMBtu  
☐ Equipment 4  
☐ Equipment 5

Q34. Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

	New or Existing	MBTU per Hour	End Use	# of units	# of operating hours per day (Not to exceed 24)	# of operating days per week	# of weeks per year (Not to exceed 52)
CNG Compressor #1 32.33 MMBtu	New ▼	32.33	NGV/CNG/RNG ▼	1 ▼	24	7 ▼	52
CNG Compressor #2 32.33 MMBtu	New ▼	32.33	NGV/CNG/RNG ▼	1 ▼	24	7 ▼	52

Q35. Please provide any additional project information you feel is pertinent to your application.

We look forward to working with you. If you have any questions or comments, please feel free to contact me at the email/phone number below. Thank You.

Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.

File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif

Uploaded files should not exceed 50MB each

Only one file is allowed per upload section

[S1%20\(2025-01-21\)S1.pdf](#)  
1.3MB  
application/pdf

Q37.

Q38.

Q39.

Q40. You have completed the required questions. Click “Submit” to submit your application.

If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).



**Project H Customer Application Marked CONFIDENTIAL**

**From:** [New Business Allowance Application Exception](#)  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] New Business Allowance Application Exception Response Form  
**Date:** Thursday, February 13, 2025 2:16:31 PM

**CAUTION! External Sender**

This email came from outside the company. If you're unsure whether this message is harmless, click the "Report Suspicious" button.

[Report Suspicious](#)

A new application has been submitted. Please see the results below.

[Download as PDF \[socialgas.iad1.qualtrics.com\]](#)

## Recipient Data:

<b>Response ID</b>	R_7rOuCljLqwXe9Aj
<b>End Date</b>	2025-02-13T22:12:58Z
<b>IP Address</b>	[REDACTED]

<b>URL to view Results</b>	<a href="#">[Click Here [socialgas.iad1.qualtrics.com]]</a>
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## Response Summary:

### Apply for the New Business Allowance Exception Application

**Please fill out the information below to begin your New Business Allowance Exception Application. Responses must be completed in a single session as they cannot be saved. Once submitted, you will receive confirmation of your application receipt.**

Background:

Pursuant to the California Public Utilities Commission (CPUC) Decision 22-09-026 as part of Rulemaking 19-01-011, Order Instituting Rulemaking Regarding Building Decarbonization, customers may request approval from the CPUC through an annual

application for a gas line extension allowance, a 10-year refundable payment option, or a 50 percent discount payment option for non-residential projects meeting the criteria established below:

(a) The project shows a demonstrable reduction in greenhouse gas emissions;

(b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016); and

(c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.

Eligible projects will be included in an annual application submitted by the gas utilities on behalf of project applicants requesting an exception to the new rules.

*Disclaimer: SoCalGas' sole responsibility is to review all applications and submit qualifying projects to the CPUC for final approval or rejection. SoCalGas and/or the CPUC may require additional documentation or information to proceed with the application process. Per the CPUC, SoCalGas is only permitted to submit applications once per year, this means that the response timeline could vary greatly. Due to this, SoCalGas cannot provide any timeline for Gas Line Extension Allowances, Refunds, or Discount Exceptions.*

### Q3. Applicant information

**Please input the business owner contact information as it should appear on the contract that will be generated to establish or re-establish natural gas service, or to upsize the meter due to the installation of additional natural gas appliances. The business owner will be liable to comply with all the terms and conditions outlined in the contract. SoCalGas will direct all communications, bills, and refunds to the business owner.**

<b>First name</b>	
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<b>Last name</b>	[REDACTED]
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**Q4. Business information**

<b>Business name</b>	[REDACTED]
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**Q5. Please select your business use industry from the drop-down list below.**

- Clean Transportation (CNG, RNG, Hydrogen)

**Q6. Is this project located within the state of California?**

- Yes

**The following sections will help determine the eligibility of your exception application.**

**Criteria (a) The project shows a demonstrable reduction in greenhouse gas emissions.**

**Q9. How does your project contribute to GHG reduction?**

[REDACTED] CNG station project has the potential to reduce up to approximately 15,047 MTCO<sub>2</sub>e/year of greenhouse gas (GHG) emissions relative to conventional ULSD under the California Air Resources Board Lower Carbon Fuel Standard (LCFS) Program<sup>1</sup>.

[REDACTED] has renewable natural gas (RNG) supply from multiple sources registered under both the RFS and LCFS programs. In addition, For example, [REDACTED] has established joint ventures with [REDACTED] and [REDACTED] to capture biomethane from dairy farms and produce RNG under both programs<sup>2</sup>. The [REDACTED] CNG station will be added to these pathways once the station is mechanically complete, and the station's sales are planned to be linked to RNG. Below is a table of EPA RFS registrations for these dairy RNG projects from the Part 80 Fuels Registration Listing.

**Q10. What is your project's yearly estimated GHG reduction compared to an alternative input?**

15,047 MTCO<sub>2</sub>e/year of greenhouse gas (GHG)

**Q11. Are you able to provide documentation that shows you are taking part in GHG reduction (i.e., Low Carbon Fuel Standard (LCFS) and or Renewable Identification Number (RINs/ERINs credits)?**

- Yes

**See list below for additional greenhouse gas emission resources:**

[Environmental Protection Agency \[epa.gov\]](http://epa.gov)

[USEPA - General Stationary Combustion Source \(Subpart C\), Subpart C Methodologies \[epa.gov\]](http://epa.gov)

[Argonne National Laboratory - Argonne GREET Model \[greet.es.anl.gov\]](http://greet.es.anl.gov)

**Q13. Does your project use technology that significantly increases energy efficiency over what is commercially available?**

- No

**Q15. What is this project's estimated energy reduction?**

n/a

**Criteria (b) The project's gas line extension is consistent with California's climate goals, including those articulated in Senate Bill 32 (Pavley, 2016).**

**Q17. How is your line extension project consistent with California's climate goals?**

**See list below for a few helpful hyperlinks regarding California's climate goals:**

**Senate Bill 32 California Global Warming Solutions Act of 2006**

**California Air Resource Board (CARB)**

**2022 Scoping Plan for Achieving Carbon Neutrality**

Low Carbon fuels for transportation and digester methane capture are critical actions referenced in table 2-1 of the 2022 Scoping Plan for Achieving Carbon Neutrality. The [REDACTED] CNG station's sales are intended to be linked to RNG having a significant reduction in transportation emissions of up to 15,072 MTCO<sub>2</sub>e/year relative to fossil ULSD under the California LCFS program. By building CNG stations to anchor upstream RNG production, this enables economic RNG digester development per SB1383 and reducing the gap of 420 digester projects mentioned in the 2022 Scoping Plan Report.

**Q18. Does your project qualify for any of the following programs? (select all that apply)**

- None of the above

**To learn more about California Energy Commission programs click [here](#).**

**Q20. What are your organization's sustainability goals?**

[REDACTED] strives to protect the environment, empower people and get results the right way. We believe renewable fuels can help reduce the life cycle carbon intensity of transportation fuels today. [REDACTED] has [REDACTED] of planned capital allocation through 2028 to grow lower carbon energies. As part of this allocation, we are developing renewable natural gas (RNG) projects that capture dairy biomethane to create a valuable renewable fuel. We intend to link the [REDACTED] CNG station's sales to RNG under the California LCFS program as part of our sustainability efforts. For more on [REDACTED] sustainability goals and commitments please refer to our 2023 Sustainability Report:

**Criteria (c) The project demonstrates that it has no feasible alternatives to the use of natural gas, including electrification.**

**Q22. Are there any other feasible alternatives to the use of**

**natural gas?**

- No

**Q23. What other technology alternatives are available for your business or operation?**

There are no other viable technologies alternatives for retail sales of CNG.

**Q24. How would you operate your business if natural gas equipment was not available?**

We cannot operate our business without natural gas equipment.

**Q25. What is your end use of natural gas?**

Retail sales of CNG for natural gas vehicles.

**Q26. Project location Information:**

**Please provide the project details.**

<b>Street address (please provide unit number if applicable)</b>	
<b>City</b>	
<b>County</b>	
<b>Zip Code</b>	
<b>E-mail address</b>	
<b>Best contact phone number (use this format: 000- 000-0000)</b>	

**Q27. Air district for the project location:**

- San Joaquin Valley APCD (all of Fresno, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare, and Valley air basin portions of Kern counties)

**Q28. Is this project located in a disadvantaged community?**

*Disadvantaged communities refer to the areas throughout California that most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, the presence of hazardous wastes as well a high incidence of asthma and heart disease.*

*To find out if your project is located in a Disadvantaged community, please click the link [here](#).*

- Yes

**Please provide the requested gas meter turn-on date for this project below.**

**Q30. Enter a date:**

01-30-2026

**Q31. Project Construction Status**

- New

**Q33. Please list any equipment included in this project application.**

**Please list all new and existing natural gas equipment and load.**

**\*If you have multiple pieces of the same type of equipment with different loads, please list them separately.**

- Equipment 1:  
CNG Compressor

**Q34#1. Please provide the information requested for each piece of equipment you stated.**

***Existing* equipment includes any natural gas equipment currently**

at your project site. **New equipment** includes any natural gas equipment you plan to install that is not currently at your project site.

**- New or Existing**

<b>Equipment 1</b>	New
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**Q34#2.** Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New equipment** includes any natural gas equipment you plan to install that is not currently at your project site.

**- MBTU per Hour**

<b>Equipment 1</b>	822.4
<b>Equipment 2</b>	N/A
<b>Equipment 3</b>	N/A
<b>Equipment 4</b>	N/A
<b>Equipment 5</b>	N/A

**Q34#3.** Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New equipment** includes any natural gas equipment you plan to install that is not currently at your project site.

**- End Use**

<b>Equipment 1</b>	NGV/CNG/RNG
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**Q34#4.** Please provide the information requested for each piece of equipment you stated.



**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- # of units

<b>Equipment 1</b>	2
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**Q34#5.** Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- # of operating hours per day (Not to exceed 24)

<b>Equipment 1</b>	8
<b>Equipment 2</b>	N/A
<b>Equipment 3</b>	N/A
<b>Equipment 4</b>	N/A
<b>Equipment 5</b>	N/A

**Q34#6.** Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- # of operating days per week

<b>Equipment 1</b>	7
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**Q34#7.** Please provide the information requested for each piece of equipment you stated.

**Existing** equipment includes any natural gas equipment currently at your project site. **New** equipment includes any natural gas equipment you plan to install that is not currently at your project site.

- # of weeks per year (Not to exceed 52)

<b>Equipment 1</b>	52
<b>Equipment 2</b>	N/A
<b>Equipment 3</b>	N/A
<b>Equipment 4</b>	N/A
<b>Equipment 5</b>	N/A

**Q35. Please provide any additional project information you feel is pertinent to your application.**

N/A

**Q36. Please upload any additional documents or proposed testimony you feel are pertinent to your application.**

File type options are: pdf, doc, docx, txt, csv, xls, xlsx, jpg, png, gif

Uploaded files should not exceed 50MB each

Only one file is allowed per upload section

[[Click here \[socalgas.iad1.qualtrics.com\]](https://socalgas.iad1.qualtrics.com/)]

**Q37.**

N/A

**Q38.**  
N/A

**Q39.**  
N/A

**You have completed the required questions. Click “Submit” to submit your application.**

**If you have any questions, please email us at [NBAAllowanceException@socalgas.com](mailto:NBAAllowanceException@socalgas.com).**

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

**DECLARATION OF ERIN BROOKS  
REGARDING CONFIDENTIALITY DESIGNATION OF CERTAIN DATA**

I, Erin Brooks, declare as follows:

1. I am the Director of Customer Energy Solutions for Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Don Widjaja, Vice President of Customer Services. I have reviewed the customer related confidential information included within the documents, “SCG-02-Prepared Direct Testimony of Jason Legner Selected Projects (Chapter 2) – Selected Projects” and “SCG-02-WP–Workpaper Supporting the Prepared Direct Testimony of Jason Legner” submitted in the Application of Southern California Gas Company, on behalf of its customers, for Approval of Gas Line Extension Allowances dated July 1, 2025. I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 21-09-020 and General Order (“GO”) 66-D to demonstrate that the confidential information (“Protected Information”) provided in the “SCG-02-Prepared Direct Testimony of Jason Legner Selected Projects (Chapter 2) – Selected Projects” and “SCG-02-WP–Workpaper Supporting the Prepared Direct Testimony of Jason Legner” are within the scope of data protected as confidential under applicable law.

3. In accordance with the legal authority described in Attachment A, the Protected Information should be protected from public disclosure.

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 27<sup>th</sup> day of July 2025, at Los Angeles, California.

Erin Brooks  
Director of Customer Energy Solutions

*Erin Brooks*

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

**ATTACHMENT A –**

**SoCalGas Request for Confidentiality on the following Protected Information in  
the Application of Southern California Gas Company, on behalf of its customers, for  
Approval of Gas Line Extension Allowances**

Location of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
<p>Customer-related information (highlighted) in:</p> <ul style="list-style-type: none"> <li>• “SCG-02-Prepared Direct Testimony of Jason Legner Selected Projects (Chapter 2) – Selected Projects”</li> <li>• “SCG-02-WP–Workpaper Supporting the Prepared Direct Testimony of Jason Legner”</li> </ul>	<p>California Public Records Act (CPRA) Exemption, Gov’t Code § 7927.705 (“Records, the disclosure of which is exempted or prohibited pursuant to federal or state law”):</p> <ul style="list-style-type: none"> <li>• Cal. Civil Code § 1798.21 (requiring agencies to “ensure the security and confidentiality of” personal data)</li> <li>• Cal. Civil Code § 1798.81.5(b) (“business that owns, licenses, or maintains personal information about a California resident shall implement and maintain reasonable security procedures and practices appropriate to the nature of the information, to protect the personal information from unauthorized access, destruction, use, modification, or disclosure.”)</li> <li>• Cal. Civil Code § 1798.24 (limiting disclosure of personal information)</li> <li>• Cal. Civil Code §§ 1798.80 <i>et seq.</i> (process for protecting customer records)</li> <li>• Cal. Civil Code § 1798.81.5 (security procedures and practices with respect to personal information about California residents)</li> <li>• <i>Britt v. Superior Court</i>, 20 Cal. 3d 844, 855-856 (1978) (even highly relevant information may be shielded from discovery if its disclosure would impair a person’s inalienable right of privacy provided by the California Constitution)</li> <li>• <i>Valley Bank of Nev. v. Superior Court</i>, 15 Cal.3d 652, 658 (1975) (Financial information is protected – especially of non-parties)</li> <li>• D.06-12-029, Appendix 3 (Affiliate Transaction Rules), p. 9 (“A utility shall provide customer information</li> </ul>	<p>Contain personally identifiable customer information for which confidential treatment is sought or information that can lead to the identification of the customer.</p> <p>If publicly disclosed, such personal information could pose a risk of fraud, identity theft, or other personal, commercial, or financial damage to customers.</p>

	<p>to its affiliates and unaffiliated entities on a strictly non-discriminatory basis, and only with prior affirmative customer written consent.”)</p> <p>CPRA Exemption, Gov’t Code § 7927.700 (“disclosure of which would constitute an unwarranted invasion of personal privacy”)</p> <p>D.97-10-031; D.11-07-056; D.12-08-045; D.14-05-016 (Customer contact information is considered confidential to protect privacy rights in the absence of express consent or upon a CPUC order or law.)</p>	
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