

**SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)**  
**CAL ADVOCATES-SCG-A2209006-001**  
**(DR-001) UCI Supplemental**  
**DATE REQUESTED: July 28, 2025**  
**RESPONSE DUE: August 11, 2025**

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**QUESTION 3:**

- a) What comprehensive risk assessment has been conducted:
- (i) for SoCalGas' Closed Project;
  - (ii) for the specific hydrogen blend percentages attempted in SoCalGas' Closed Project; and
  - (iii) for each segment of the California gas infrastructure for which the pilot project was designed?

**RESPONSE 3:**

- a) SoCalGas evaluates baseline risk for asset failure of their medium pressure system as outlined in the RAMP report with an established threshold of annual probability greater than  $6 \times 10^{-6}$  of a serious incident.<sup>1</sup>

Upon authorization to proceed with the project, SoCalGas will develop an in-depth risk analysis for the hydrogen production and blending facility as part of Phase 1 Planning, Design, and Construction. Efforts planned for the project design to identify potential hazards and incorporate appropriate mitigative measures may include:

- Hazard Identification (HAZID),
- Quantitative Risk Assessment (QRA),
- Hazard and Operability Study (HAZOP).

In addition to the scoping and engineering risk assessment, independent third parties will be engaged during the pre-commissioning process to review final design and commissioning safety protocols with SoCalGas and UCI facilities personnel (Pre-Startup Safety Review (PSSR)).

As such, SoCalGas responds to each individual component as follows:

- (i) SoCalGas will perform an in-depth Asset Failure analysis for the hydrogen production and blending facility, as outlined in detail above

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<sup>1</sup> SoCalGas's RAMP indicates the baseline risk of incident as follows: "In the absence of an established safety risk threshold from PHMSA and other regulatory bodies, SoCalGas has established a threshold of an annual probability greater than  $6 \times 10^{-6}$  of a serious incident for medium pressure distribution main locations."

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- (ii) SoCalGas's comprehensive risk analysis will focus on the hydrogen production and blending facility rather than the hydrogen blend percentages proposed in SoCalGas's Closed system project, unless directed to do so by the Commission.
- (iii) SoCalGas's comprehensive risk analysis will focus on the hydrogen production and blending facility rather than each segment of the gas infrastructure proposed in the proposed demonstration project, as these have already been characterized in SoCalGas' RAMP filing as outlined above