

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR A.25-06-011 ANGELES LINK
PHASE 1 REASONABLENESS REVIEW (DATA REQUEST SCGC-SCG-01)**

Date Requested: August 12, 2025, Submitted: August 26, 2025

QUESTION 1: Please provide copies of all data requests received by the Southern California Gas Company ("SoCalGas") regarding Application ("A.") 25-06-011.

RESPONSE 1:

As of the date of this data request response, SoCalGas has not received other data requests regarding Application (A.) 25-06-011.

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QUESTION 2: Please provide all data responses provided by SoCalGas regarding A.25-06-011.

RESPONSE 2:

As of the date of this data request response, SoCalGas has not received or responded to other data requests regarding A.25-06-011.

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QUESTION 3: Regarding the Prepared Direct Testimony of Shirley Arazi and Amy Kitson, Chapter 1-Overall Programmatic, page SA-AK-11, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Table 1: Angeles Link Phase 1 Total Cost (2023-2025) (in millions).

RESPONSE 3:

Please refer to attachment "ALP1-RR_A2506011_DR_SCGC_01_Q03_Attach_
Testimony_and_Workpaper_Cost_Tables".

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QUESTION 4: Regarding the Prepared Direct Testimony of Shirley Arazi and Amy Kitson at page SA-AK-12 regarding “exploration of potential non-ratepayer funding,” please explain in detail all SoCalGas efforts to obtain non-ratepayer funding to cover the total Angeles Link Memorandum Account Balance of \$24.3 million shown in Table 1: Angeles Link Phase 1 Total Cost (2023-2025) (in millions).

RESPONSE 4:

The referenced testimony is forward looking and relates to the Phase 1 Affordability Framework¹ which was prepared pursuant to Decision (D.) 22-12-055, Ordering Paragraph 5(a), and describes how Angeles Link’s planning process considered and identified opportunities to mitigate affordability concerns. The reference to “exploration of potential non-ratepayer funding” was provided as an example of potential strategies for addressing cost-effectiveness and affordability in future phases of Angeles Link.

¹ Angeles Link Phase 1 Affordability Framework Study, Section IV.C.1 at 17-22, available at: <https://www.socalgas.com/sites/default/files/alproject/Angeles-Link-Phase-1-Final-Framework-for-Affordability-Considerations.pdf>

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QUESTION 5: In the Prepared Direct Testimony of Shirley Arazi and Amy Kitson, the witnesses state at page SA-AK-15 through SA-AK-16, “SoCalGas coordinated with ARCHES, and Angeles Link was included in ARCHES’ April 2023 application to DOE, specifically detailing the HUB Segments....” In footnote 68 to that statement, the witnesses state, “The San Joaquin Valley pipeline segment is an approximately 80-mile pipeline expected to connect various producers and end users in the San Joaquin Valley in Central California. The Lancaster pipeline segment would run approximately 45 miles from Lancaster to the Los Angeles Basin.” In footnote 69 on page SA-AK-16, the witnesses state, “ARCHES stated in its application for federal funding: ‘Similarly, although a large statewide interconnected pipeline network is not included within the hub timeframe and funding request due to the magnitude of funding and timeframe required to realize such an enterprise (although 165 miles of new regional pipelines are included as an initial investment in the network), the initial projects are chosen to be able to realize and use such a common carrier system as it is introduced in parallel efforts of both utility and private companies in the future.’” In connection with those statements, please answer the following sub-questions:

- 5.1. Please confirm that the San Joaquin Valley pipeline segment and the Lancaster pipeline segment constitute what the witnesses call the “Hub Segments.” If they do not constitute what the witnesses call the “Hub Segments,” please provide an explicit definition of what constitutes the “Hub Segments.”
- 5.2. In footnote 68, the witnesses state that the San Joaquin Valley pipeline segment is an 80-mile pipeline segment, and the Lancaster pipeline segment is a 45-mile pipeline segment for a total of 125 miles. However, in footnote 69 the witnesses say that “165 miles of regional pipelines are included” in the ARCHES application for federal funding. Thus, ARCHES requested in its application funding for 40 miles in addition to the 125 miles constituting the Hub Segments. Where are the additional 40 miles located? Please provide as much detail as you can about the additional 40 miles.
- 5.3. Is the “Hub timeframe” referenced in footnote 69 the period ending 2033? If not, please identify the “Hub timeframe.”
- 5.4. Does the California Hydrogen Hub as proposed in the ARCHES application for federal funding consist of the 80 miles San Joaquin Valley pipeline segment, the 45-mile Lancaster Pipeline segment, and the additional unspecified 40 miles of “new regional pipelines?” If not, please provide a narrative description explaining the features that are included in the “California Hydrogen Hub.”

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RESPONSE 5:

- 5.1. Yes.
- 5.2. SoCalGas objects to this request to the extent that it seeks information that is not within SoCalGas's knowledge. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.
- The additional 40 miles of regional pipelines referenced in the ARCHES Technical Submission are pipelines that were proposed by one or more entities other than SoCalGas at the time of the ARCHES DOE application. Please refer to the ARCHES Technical Submission² for a map of primary ARCHES project deployment sites across California, which include high-level pipeline locations.
- 5.3. SoCalGas understands "Hub timeframe" to be the timeframe ARCHES anticipates funded projects to be operational. At the time of the Application, SoCalGas understood the Hub timeframe to be the end of 2033.
- 5.4. SoCalGas objects to this request to the extent that it seeks information that is not within SoCalGas's knowledge. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. At the time SoCalGas submitted this Application, SoCalGas understood that the California Hydrogen Hub, as proposed in the ARCHES Technical Submission, consisted of the SoCalGas Hub Segments and 40 miles of additional regional pipeline not proposed by SoCalGas, as discussed in Response 5.2 above.

² ARCHES H2, ARCHES Technical Submission to DOE (April 2023) Figure 3.9 at 41, available at <https://archesh2.org/wp-content/uploads/2024/08/ARCHES-Technical-Volume-Redacted.pdf>.

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QUESTION 6: Regarding the Prepared Direct Testimony of Frank Lopez, page FL-4, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Table 1: Chapter 2 Total Capital Cost (in millions).

RESPONSE 6:

Please see Response 3.

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QUESTION 7: Regarding the Prepared Direct Testimony of Vijai Atavane, page VA-3, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Table 1: Chapter 3 Total Cost (in millions).

RESPONSE 7:

Please see Response 3.

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QUESTION 8: Regarding the Prepared Direct Testimony of Jessica Kinnahan Foley, page JKF-3, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Table 1: Chapter 4 Total Costs (in million).

RESPONSE 8:

Please see Response 3.

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QUESTION 9: Regarding the Prepared Direct Testimony of Katrina Regan, page KR-3, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Table 1: Chapter 5 Total Cost (in millions).

RESPONSE 9:

Please see Response 3.

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QUESTION 10: At page KR-6, witness Regan states, “Potential directional routes presented in the evaluation aimed to connect two SoCalGas segments identified within the California Hydrogen Hub....”

- 10.1. Please explain whether the “two SoCalGas segments identified within the California Hydrogen Hub” are the San Joaquin Valley and Lancaster segments totaling 125 miles of pipeline.
- 10.2. If the answer to question 10.1 is “no,” please describe explicitly the “two SoCalGas segments” identified within the California Hydrogen Hub.
- 10.3. If the answer to 10.1 is “yes,” please explain why witness Regan omits the remaining 40 miles referenced in footnote 69 of the testimony by Shirley Arazi and Amy Kitson when those witnesses discuss “165 miles of new regional pipelines.”

RESPONSE 10:

- 10.1. Yes. The San Joaquin Valley and Lancaster segments are the two SoCalGas segments identified in the California Hydrogen Hub, also known as the “Hub Segments”, totaling approximately 125 miles.
- 10.2. Please see Response 10.1.
- 10.3. Please see Response 5.4.

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QUESTION 11: At page KR-21, witness Regan states, “After the announcement of the California Hydrogen Hub’s funding award from the DOE in October 2023, the technical approach was also updated to incorporate information about other California Hydrogen Hub project(s) as relevant.” What are the “other California Hydrogen Hub project(s)?”

RESPONSE 11:

SoCalGas considered and incorporated information from other California Hydrogen Hub projects, such as the location of potential ARCHES Production and Offtake Sites. For further information, please refer to the Angeles Link Phase 1 Preliminary Routing/Configuration Analysis (Routing Analysis).³

³ Angeles Link Phase 1 Routing Analysis, Section 5.1.1 Preferred Routes Descriptions (ARCHES Production and Offtake Sites) at 55, available at:
www.socalgas.com/sites/default/files/alproject/Angeles-Link-Phase-1-Final-Preliminary-Routing-&-Configuration-Analysis.pdf.

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QUESTION 12: At page KR-22, witness Regan states, “The Routing Analysis incorporated the SoCalGas Hub Segments in the criteria for selection of potential directional routes.” In connection with that statement, please answer the following sub-questions:

- 12.1. Does witness Regan’s reference to the “SoCalGas Hub Segments” refer to the 80-mile San Joaquin Valley pipeline segment and the 45-mile Lancaster pipeline segment only, or does it include more pipeline mileage? If more, please identify the locations and lengths of the additional mileage.
- 12.2. Did ARCHES identify locations and lengths of the San Joaquin Valley pipeline segment and the Lancaster pipeline segment on its own independently of input from SoCalGas? Please explain your answer.
- 12.3. Alternatively, did SoCalGas identify the San Joaquin Valley pipeline segment and the Lancaster pipeline segment and then suggest those segments to ARCHES for inclusion in the ARCHES application to the Department of Energy? Please explain your answer.
- 12.4. If constructed would ARCHES own the San Joaquin Valley pipeline segment and the Lancaster pipeline segment? If not, who would own those segments? Please explain your answer.
- 12.5. If the San Joaquin Valley Segment and the Lancaster pipeline segment were constructed and placed in operation prior to the remainder of Angeles Link, would SoCalGas operate those pipeline segments? If not, who would operate those pipeline segments? Please explain your answer.

RESPONSE 12:

- 12.1. The Hub Segments refer to the 80-mile San Joaquin Valley pipeline segment and the 45-mile Lancaster pipeline segment only.
- 12.2. SoCalGas objects to this request to the extent that it seeks information that is not within SoCalGas’s knowledge. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. Based on SoCalGas’s knowledge, ARCHES did not identify locations and lengths of the Hub Segments independently of input from SoCalGas.
- 12.3. Yes. Please see Response 12.2.
- 12.4. No. SoCalGas would own and operate the pipelines constructed for Angeles Link, which include the Hub Segments.
- 12.5. Please see Response 12.4.

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QUESTION 13: In the Angeles Link Phase 1 Reasonableness Review Chapter 5 Workpaper: Engineering & Design Workpaper, page 5, the workpaper states that “the third-party storage technology and analysis was moved to the Production Study.” Please identify the pages at which the “third-party storage technology analysis” is presented in the Production Study.

RESPONSE 13:

The “third party storage analysis” is documented in Appendix B⁴ and Appendix C⁵ of the Angeles Link Phase 1 Production Planning and Assessment Study (Production Study). Appendix B provides details across various hydrogen storage pathways and Appendix C describes the evaluation of potential storage pathways.

⁴ Angeles Link Phase 1 Production Study, Section 13.2 - Appendix B: Hydrogen Storage at 92-112, available at: <https://www.socalgas.com/sites/default/files/alproject/Angeles-Link-Phase-1-Final-Production-Planning-&-Assessment.pdf>.

⁵ Angeles Link Phase 1 Production Study, Section 13.3 – Appendix C at 113-137, available at: <https://www.socalgas.com/sites/default/files/alproject/Angeles-Link-Phase-1-Final-Production-Planning-&-Assessment.pdf>.

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QUESTION 14: Who performed the “third-party storage technology analysis,” and what were the associated costs?

RESPONSE 14:

SoCalGas commissioned the “third-party storage technology analysis” from Burns & McDonnell. The analysis was conducted, and the Angeles Link Phase 1 Production Study was prepared, collaboratively.⁶ The associated costs are \$292,433.

⁶ Angeles Link Phase 1 Production Study, available at:
<https://www.socalgas.com/sites/default/files/alproject/Angeles-Link-Phase-1-Final-Production-Planning-&-Assessment.pdf>.

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QUESTION 15: Regarding the Prepared Direct Testimony of Jenny Chhuor and Michael W. Foster, Chapter 6-Revenue Requirement, Cost Recovery and Rates, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Tables 1-3.

RESPONSE 15:

Please refer to the following attachments:

ALP1-RR_A2506011_DR_SCGC_01_Q15_Attach_Table_1-2
ALP1-RR_A2506011_DR_SCGC_01_Q15_Attach_SCG_AL_Rates
ALP1-RR_A2506011_DR_SCGC_01_Q15_Attach_SDGE_AL_Rates