

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR  
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST SCGC-SCG-DR02**

**Date Requested: August 26, 2025, Submitted: September 10, 2025**

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**QUESTION 2.1:**

2.1. In the Southern California Gas Company ("SoCalGas") response to Southern California Generation Coalition ("SCGC") Data Request 1, Question 7, SoCalGas provided to SCGC the Department of Energy ("DOE") Office of Clean Energy Development ("OCED") Awardee Fact Sheet. Please answer the following questions about the Awardee Fact Sheet:

2.1.1. The Awardee Fact Sheet that SoCalGas provided to SCGC is not dated. What was the date of the Awardee Fact Sheet?

2.1.2. On what date did SoCalGas obtain the Awardee Fact Sheet?

**RESPONSE 2.1:**

2.1.1 SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas additionally objects to this request on the grounds it is unduly burdensome to the degree this information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Based on the Department of Energy's website address, where this document can be accessed, it is labeled July 2024, see highlighted section below.

[https://www.energy.gov/sites/default/files/2024-07/H2Hubs%20ARCHES\\_Award%20Fact%20Sheet.pdf](https://www.energy.gov/sites/default/files/2024-07/H2Hubs%20ARCHES_Award%20Fact%20Sheet.pdf)

2.1.2 SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The exact date on which SoCalGas obtained the document is unknown. The document itself is publicly available and is labeled July 2024 (see Response 2.1.1).

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**QUESTION 2.2:**

2.2. In the Prepared Direct Testimony of Neil Navin at page NN-30, Mr. Navin states, “DOE has committed to fund up to \$30 million for DOE Phase 1 activities.” The DOE Funding Opportunity Announcement DE-FOA-0002779 (“FOA”) divided DOE funding for Hydrogen Hubs into a four-phase structure. At page NN-29, Mr. Navin summarized DOE Phase 1 as follows:

DOE Phase 1 involves “detailed project planning” and encompasses initial planning and analysis activities to ensure that the overall H2Hub concept is technologically and financially viable. Deliverables for this first phase include front-end engineering and design (approximately 30%) and a Class 3 cost estimate. DOE has stated that applicants should plan approximately 12-18 months for DOE Phase 1, depending on the extent of advanced planning and analysis each team has already completed.

Mr. Navin in footnote 55 references the description of DOE Phase 1 in the FOA at page 20 to support his summary of DOE Phase 1.

The “Phase 1 OCED Award amount” identified on page 1 of the Awardee Fact Sheet is \$30 million. The Awardee Fact Sheet says that the Phase 1 OCED Award amount of \$30 million “Represents OCED’s cost share for the initial project phase.” At page 2, the Awardee Fact Sheet explains further, “In July 2024, OCED awarded ARCHES with \$30 million of the first tranche of funding (out of the total project federal cost share of \$1.2 billion) to begin Phase 1, which is expected to last up to 18 months and includes planning, design, and community and labor engagement activities.” The Awardee Fact Sheet says, “Additional funding for this project is subject to future award negotiations at the end of each project phase.”

Did SoCalGas submit an application, letter, or other document to the Alliance for Renewable Clean Hydrogen Energy Systems (“ARCHES”), the recipient of the DOE award, for any portion of the \$30 million that was awarded in July 2024? If so, please provide the application, letter, or other document in which SoCalGas sought to receive all or a portion of the \$30 million.

**RESPONSE 2.2:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead

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to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

Confidential and Protected Materials which are provided pursuant to PUC Section 583, D.21-09-020 and GO 66-D (Revision (Rev.) 2) and/or an executed Non-Disclosure Agreement (NDA).

No. In March 2023, ARCHES indicated it had allocated [REDACTED] to SoCalGas for use beyond DOE Phase 1 for its projects included in ARCHES' DOE Application. ARCHES was thereafter awarded \$30 million specifically for DOE Phase 1.

Attachment: Confidential\_ALP2\_A2412011\_DR\_SCGC\_02\_Q02\_Attach\_01\_Email

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**QUESTION 2.3:** How much of the July 2024 award of \$30 million remains unspent by ARCHES?

**RESPONSE 2.3:**

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas additionally objects to this request on the ground it is unduly burdensome to the degree this information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Unknown.

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**QUESTION 2.4:**

- 2.4. The Awardee Fact Sheet at page 1 identifies the DOE Phase 1 total Project Amount as being \$186 million. The Awardee Fact Sheet says the \$186 million, “Represents the total project costs for the initial project phase.”
- 2.4.1 Does SoCalGas understand that the \$186 million is in addition to the \$30 million or, instead, includes the initial award of \$30 million? Please provide a narrative explanation of SoCalGas’s understanding.
- 2.4.2 Has SoCalGas submitted to ARCHES a request for all or a portion of the \$186 million? If so, please identify the portion and provide the document in which SoCalGas requests a portion of the \$186 million.
- 2.4.3 Is it SoCalGas’s understanding that SoCalGas has to wait until the end of DOE Phase 1 to request all or a portion of the \$186 million? Please provide a narrative explanation of SoCalGas’s understanding.

**RESPONSE 2.4:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas additionally objects to this request on the ground it is unduly burdensome to the degree this information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- 2.4.1 It is SoCalGas’s understanding that the Phase 1 Total Project Amount of \$186 million includes the Phase 1 OCED award amount of \$30 million.
- 2.4.2 Please refer to Response 2.2.
- 2.4.3 In addition to the foregoing objections, SoCalGas further objects to this request on the grounds it presumes facts that are not true. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. While SoCalGas is not a subrecipient pursuant to an agreement with ARCHES, SoCalGas remains open to available and appropriate non-ratepayer funding opportunities.

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**QUESTION 2.5:**

- 2.5 If SoCalGas has not requested some or a portion of the \$186 million for DOE Phase 1, will SoCalGas request some or all of the \$186 million at the appropriate time, e.g., at the end of DOE Phase 1?

**RESPONSE 2.5:**

Please see Responses 2.2 and 2.4.3 above.

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**QUESTION 2.6:**

2.6 In Response 3 to SCGC Data Request 1, SoCalGas says that it “roughly estimates that the potential funding amount... would not offset associated compliance costs,” and SoCalGas adds: “For example, Build America Buy America provisions alone are expected to add tens of millions of dollars in additional expenses.” At page 85 the FOA explains the Buy America Requirements for Infrastructure Projects as follows:

Pursuant to the Build America Buy America Act, subtitle IX of BIL (Buy America), federally assisted projects that involve infrastructure work, undertaken by applicable recipient types, require that:

- All iron, and manufactured products used in the infrastructure work are produced in the United States; and
- All construction materials used in the infrastructure work are manufactured in the United States.

In general, whether a given project must apply this requirement is dependent on several factors, such as the recipient’s entity type, whether the work involves “infrastructure,” as that term is defined in Section 70914 of the BIL.

Section 70914 of the BIL requires that “all of the iron, steel, manufactured products, and construction materials used in the project are produced in the United States.” Would any of the activities undertaken under DOE Phase 1 involve construction so as to trigger Section 70914 of the BIL?

**RESPONSE 2.6:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas additionally objects to this request on the ground it is unduly burdensome to the degree this information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

As mentioned in response to SCGC Data Request 1, Response 6, “what DOE/ARCHES defines as Phase 1 is more comparable to Angeles Link Phase 2”. SoCalGas does not understand BIL to apply to the Angeles Link Phase 2 activities proposed in the Application.

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**QUESTION 2.7:**

- 2.7 Aside from the Build America Buy America compliance provisions of the BIL, please specify what other “compliance costs,” if any, that SoCalGas anticipates incurring to implement DOE Phase 1.

**RESPONSE 2.7:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas additionally objects to this request on the ground it is unduly burdensome to the degree this information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Not Applicable. SoCalGas was not allocated funding by ARCHES for DOE Phase 1 for its projects included in ARCHES’ DOE Application. See Response 2.2. Moreover, SoCalGas does not understand BIL to apply to the Angeles Link Phase 2 activities proposed in the Application.



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**QUESTION 2.8:**

- 2.8 The Awardee Fact Sheet says at page 2 that the Hub plans to develop “165 miles of open access pipelines....” Please answer the following questions about the segments that would comprise the 165 miles:
- 2.8.1 What would be the locations each of the segments that comprise the 165 miles? In answering this question, please provide a written description and a map.
  - 2.8.2 For each segment, please identify the entity that will be responsible for completing the DOE Phase 1 activities for the segment.
  - 2.8.3 For each segment, please identify the entity that will be responsible for constructing the segment.
  - 2.8.4 For each segment, please identify the entity that will be responsible for operating the segment.
  - 2.8.5 For each segment, please identify the entity that will own the segment.

**RESPONSE 2.8:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas additionally objects to this request on the ground it is unduly burdensome to the degree this information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- 2.8.1 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. For a description and a map of these two SoCalGas segments, please refer to the Angeles Link Preliminary Routing/Configuration Analysis (Routing Study).<sup>1</sup>

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

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<sup>1</sup> Angeles Link Phase 1, Routing Study at 43-45, available at <https://www.socalgas.com/sites/default/files/alproject/Angeles-Link-Phase-1-Final-Preliminary-Routing-&-Configuration-Analysis.pdf>

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pipelines referenced in the Awardee Fact Sheet 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 Submission for a map of primary ARCHES project deployment sites across California, which include high-level pipeline locations.<sup>2</sup>

- 2.8.2 SoCalGas plans to complete Angeles Link Phase 2 activities, which are comparable to DOE Phase 1 activities, and to construct, operate, and own pipelines for Angeles Link, which include the Hub Segments.

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. SoCalGas lacks knowledge or information sufficient to identify the entity responsible for completing the DOE Phase 1 activities for the additional 40 miles of regional pipelines referenced in the Awardee Fact Sheet, or for constructing, operating, and owning those 40 miles of regional pipelines.

- 2.8.3 Please see Response 2.8.2.

- 2.8.4 Please see Response 2.8.2.

- 2.8.5 Please see Response 2.8.2.

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<sup>2</sup> 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>