

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

DATA REQUEST SCGC-SCG-DR01

Date Requested: August 8, 2025, Submitted: August 22, 2025

QUESTION 1: Please provide copies of all data requests received by the Southern California Gas Company ("SoCalGas") regarding Application ("A.") 24-12-011 that are not posted on the SoCalGas websites.

RESPONSE 1:

Data requests received in this proceeding to date are available on SoCalGas's website at <https://www.socalgas.com/regulatory/angeleslink/phase-2>.

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QUESTION 2: Please provide all data responses provided by SoCalGas regarding A.24-12-011 that are not posted on the SoCalGas website.

RESPONSE 2:

Attached are non-confidential data request responses that are not posted to SoCalGas's website for this proceeding (<https://www.socalgas.com/regulatory/angeleslink/phase-2>)

Attachments:

- ALP2_A2412011_DR_TURN_01_Q4_Attach01_Chap7SecIIITableExcel
- ALP2_A2412011_DR_TURN_01_Q4_Attach02_Chap7Table4Excel
- ALP2_A2412011_DR_TURN_02_Q1_Attach01_UpdatedRevReq
- ALP2_A2412011_DR_TURN_02_Q1_Attach02_Interest
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email01A_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email02A_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email03A_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email04A_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email04B_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email05A_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email05B_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q01_Email06A_AL_Demand_Study_Prelim_Outputs
- ALP2_A24-12-011_DR-UCAN-02_Q02_AL_Demand_Study_Interview_Tracker
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email01A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email01B_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email02A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email03A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email04A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email04B_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email05A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email06A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email07A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email08A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email09A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email09B_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email10A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email11A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email11B_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email12A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email12B_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email13A_AL_Demand_Study
- ALP2_A24-12-011_DR-UCAN-02_Q02_Email13B_AL_Demand_Study

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- ALP2_A24-12-011_DR-UCAN-02_Q02_Email14A_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email14B_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email15A_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email16A_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email17A_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email17B_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email17C_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email18A_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email19A_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email19B_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email20A_AL_Demand_Study
 - ALP2_A24-12-011_DR-UCAN-02_Q02_Email20B_AL_Demand_Study

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QUESTION 3: In the Prepared Direct Testimony of Maryam Brown, Chapter 1-Policy, page MB-25, Ms. Brown states, “SoCalGas is not accepting federal funding from the IIJA because the costs of complying with federal standards for receipt of such funds would far exceed the amount offered and thus would not be in the best interests of our ratepayers.” See *also* Application, p. 32. Please provide all workpapers, including active Excel spreadsheets with links and formulas intact and other documents that provide substantiation for Ms. Brown’s statement.

RESPONSE 3:

The highlighted information contains 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).

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks “all workpapers... and other documents that provide substantiation.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas roughly estimated that the potential funding amount of [REDACTED] would not offset the associated compliance costs. For example, Build America Buy America provisions alone are expected to add tens of millions of dollars in additional expenses.

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QUESTION 4: Please provide Funding Notice: Regional Clean Hydrogen Hubs | Department of Energy, DE-FOA-0002779 that SoCalGas references in Response 1-10 to DATA REQUEST TURN-SCG-DR01.

RESPONSE 4:

Please refer to attachment "ALP2_A2412011_DR_SCGC_01_Q04_Attach_DE-FOA-0002779 Regional Hydro Funding Opp Announcement".

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QUESTION 5: In Response 1-10 to DATA REQUEST TURN-SCG-DR01, SoCalGas states that “accepting federal funding would subject SoCalGas to the specific compliance obligations described therein (e.g., implementing or changing Company systems, etc.), the costs of which would significantly exceed the funding amount.” Please provide all workpapers including active Excel spreadsheets with links and formulas intact and other documents that provide substantiation for SoCalGas’s Response 1-10 to TURN.

RESPONSE 5:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks “all workpapers... and other documents that provide substantiation.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please see Response 3.

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QUESTION 6: In Response 1-10 to DATA REQUEST TURN-SCG-DR01, SoCalGas states that “the federal funding offered was for a later phase, not Angeles Link’s Phase 2, and thus would not offset the costs described in the Application.” Please provide all documents that provide substantiation for that response to TURN.

RESPONSE 6:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks “all documents that provide substantiation.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas was not offered federal funding for Angeles Link Phase 2.¹ Rather, the funding offered was for DOE/ARCHES Phase 2² and onwards, which does not align with Angeles Link’s phasing. Specifically, what DOE/ARCHES defines as Phase 1 is more comparable to Angeles Link Phase 2.

¹ See Application for a description of Angeles Link Phase 2 available at:
https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_SoCalGasApplicationALP2_PDFA_2024.12.20.pdf

² See Response 4 attachment for the Funding Opportunity Announcement for a description of DOE/ARCHES Phase 2

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QUESTION 7: Regarding the Prepared Direct Testimony of Neil Navin, Chapter 2-Angeles Link and Summary of Phase 1 Studies, page NN-30, Mr. Navin states, “DOE has committed to fund up to \$30 million for DOE Phase 1 activities.” Please provide the document referenced in footnote 59 to that statement. (The document is no longer available on the Department of Energy website.)

RESPONSE 7:

Please refer to attachment

“ALP2_A2412011_DR_SCGC_01_Q04_Attach_H2Hubs_ARCHES_Award_Fact_Sheet”.

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QUESTION 8: Please provide DOE FOA referenced in footnote 60 in Mr. Navin's testimony, page NN-30

RESPONSE 8:

Please refer to the attachment provided in Response 4.

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QUESTION 9: Regarding the Prepared Direct Testimony of Amy Kitson, Chapter 3-Project Development and Programmatic Activities, page AK-19, please provide all workpapers, including active Excel spreadsheets with links and formulas intact for Table 1: Chapter 3 Phase 2 Cost Estimates (in millions).

RESPONSE 9:

This attachment contains 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).

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks "all workpapers." Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please refer to attachment

"ALP2_A2412011_DR_SCGC_01_Q09_Attach_CONFIDENTIAL_Chapter_3".

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QUESTION 10: Regarding the Prepared Direct Testimony of Brian Walker, Chapter 4-Engineering Design, page BW-20, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Table 1: Phase 2 Engineering Design Cost Forecasts (in millions).

RESPONSE 10:

This attachment contains 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).

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks "all workpapers." Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please refer to attachment "ALP2_A2412011_DR_SCGC_01_Q10_Attach_CONFIDENTIAL_Chapter_4".

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QUESTION 11: Regarding the Prepared Direct Testimony of Nasim Ahmed and Michael W. Foster Chapter 7-Regulatory Accounting, Cost Recovery, Revenue Requirement, and Rates, pages NA-MWF-2 through NA-MWF-5, please provide all workpapers including active Excel spreadsheets with links and formulas intact for Tables 1 through 4.

RESPONSE 11:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks "all workpapers." Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please refer to attachment "ALP2_A2412011_DR_SCGC_01_Q11_Attach_Chapter_7".