

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
SBUA DR-01
HYDROGEN BLENDING DEMONSTRATION APPLICATION (A.22-09-006)
DATE REQUESTED: October 9, 2025
RESPONSE DUE: October 16, 2025

QUESTION 1:

The rebuttal testimony states: “The scope of the project described in SBUA’s testimony, including the buildings and use equipment, does not reflect the current scope for the proposed project at UC Irvine.” SoCal Gas, Chap. 10 at BW-28, In. 20-21. Please describe the building and use equipment in the current UC Irvine project scope.

RESPONSE 1:

SoCalGas objects to this request on the grounds it is unduly burdensome to the extent it seeks information that is already in the possession of or equally available to the requesting party. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

As outlined in Chapter 1 Testimony: “After collaborating with campus personnel, UC Irvine’s Anteater Recreation Center (ARC) was identified as a well-suited location to isolate and receive the blended fuel. The ARC is a large gymnasium and recreation complex on UC Irvine’s campus.”¹ The demonstration project will examine hydrogen blending in common commercial heating and cooking equipment, including boilers, water heaters, pool boilers, and food service equipment.²

¹ Corrected Revised Prepared Direct Testimony of Blaine Waymire on Behalf of Southern California Gas Company (Chapter 1, Closed System Project) at 3

² *Id.* Exhibit 1A.

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QUESTION 2:

How does SoCal Gas intend to obtain Orange Grove customers' permission to inspect customer equipment?

RESPONSE 2:

SoCalGas understands this question to pertain to Orange Cove, not Orange Grove. As outlined in SoCalGas's Chapter 2 Testimony, all customer appliances involved in the demonstration in the city of Orange Cove will be offered courtesy inspections to confirm the appliances are in safe working order.³ SoCalGas presumes that if a customer accepts the offer for a courtesy inspection, that the Orange Cove customers give their permission to inspect their equipment.

³ Prepared Direct Testimony of Blaine Waymire on Behalf of Southern California Gas Company (Chapter 2, Open System Project) at 11

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QUESTION 3:

What incentives, if any, has SoCal Gas provided or intend to provide to gain access to Orange Cove pilot customer appliances?

RESPONSE 3:

As described in Chapter 2 testimony, SoCalGas plans to offer courtesy inspections to all customers in the Orange Cove community and also perform emissions measurements in select customer premises that will be determined based on a comprehensive customer survey.⁴ SoCalGas is unclear which scenario the question is referring to. For courtesy inspections, SoCalGas does not anticipate providing additional incentives to obtain customer participation beyond the benefits associated with a free inspection, which may include minor adjustments or complimentary equipment tuning performed as part of standard customer service practices.⁵ Regarding emissions monitoring, SoCalGas has not developed its detailed data collection plan or comprehensive survey at this time, which may determine if some form of incentive is appropriate.

⁴ *Id.* at 11 & 13

⁵ *Southern California Gas Company (SoCalGas)*, Response to Appendix B of Assigned Commissioner's Scoping Memo and Ruling, Application (A.) 22-09-006, August 11, 2025, at pp. 2 and 9-10.

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QUESTION 4:

What methods has SoCal Gas offered to Orange Cove pilot customers to report any concerns regarding the operation of their appliances?

RESPONSE 4:

As outlined in Chapter 2 testimony, SoCalGas will develop a dedicated means of communicating with stakeholders that provides easy accessibility for stakeholders to get in touch about the project.⁶ Thus far, SoCalGas has already established a dedicated email address and phone number for customers to contact to request more information about the project, which is listed on SoCalGas's website in both English and Spanish versions.⁷ Further, customers can always call SoCalGas's dedicated customer service line to report any concerns regarding safety or request a courtesy inspection.⁸

⁶ Prepared Direct Testimony of Blaine Waymire on Behalf of Southern California Gas Company (Chapter 2, Open System Project). at 19

⁷ See <https://www.socalgas.com/sustainability/hydrogen/h2-blending/orange-cove-hydrogen-blending>, which has contact information at the bottom of the page. See also: <https://www.socalgas.com/es/sustainability/hydrogen/h2-blending/orange-cove-hydrogen-blending>

⁸ See <https://www.socalgas.com/about-us/contact-us>

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QUESTION 5:

SoCal Gas' testimony states "personnel will perform inspections of the relevant end-use equipment in customer homes and businesses for those customers who accept a courtesy inspection." SoCal Gas Chap. 10 at BW-29, In. 11-12.

- a) Has SoCal Gas obtained any Orange Cove customer approvals for courtesy inspections? Please state the quantity of customers broken down by customer class.
- b) How many customers in each customer class does SoCal Gas intend to obtain consent from to perform inspections in Orange Cove?

RESPONSE 5:

- a) SoCalGas has not yet begun outreach to inform customers about the availability of a courtesy inspection. This activity would occur after Commission approval.
- b) SoCalGas intends to obtain consent from every customer who asks for a courtesy inspection. SoCalGas will not enter a customer's premises for purposes of the courtesy inspection without their authorization. For clarity, SoCalGas does not have a cap for any customer class for courtesy inspections. Every customer requesting a courtesy inspection will receive one, regardless of their customer class.

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QUESTION 6:

SoCal Gas' testimony states that it defines success to, among other criteria, mean "continued stakeholder engagement within the Orange Cove Community throughout the duration of the project." SoCal Gas Chap. 10 at BW-31, In. 2-3.

- a) Has SoCal Gas determined a threshold of participation that is required to carry out the Orange Cove pilot successfully?
- b) How does SoCal Gas intend to proceed if it does not obtain a significant number of Orange Cove customers accepting inspections?

Response:

SoCalGas objects to these requests on the grounds they are premised on false assumptions. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

- a) If approved, all customers within the project area of Orange Cove (served downstream of the Orange Cove regulator station) will participate in the demonstration project.
- b) As outlined in SoCalGas Response to Appendix B of Assigned Commissioner's Scoping Memo and Ruling (A.22-09-006, Aug. 11 2025), SoCalGas will not halt the demonstration project if a customer declines a courtesy inspection.⁹ Participation in inspections is voluntary, and refusal does not impact continuation of the project or SoCalGas's ability to collect relevant data from other participants and utility-owned infrastructure.

⁹ *Southern California Gas Company (SoCalGas)*, Response to Appendix B of Assigned Commissioner's Scoping Memo and Ruling, Application (A.) 22-09-006, August 11, 2025, at pp. 24-25.

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QUESTION 7:

How many non-residential customers will be included in the proposed Orange Grove pilot?

RESPONSE 7:

SoCalGas understands this question to ask about Orange Cove, not Orange Grove. There are approximately 84 non-residential customers within the proposed Orange Cove demonstration area.

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QUESTION 8:

Please describe the surveying or other outreach that SoCal Gas has conducted with non-residential customers in connection with planning and preparing the pilot. Please provide copies of any surveys or outreach materials and any compiled aggregate data and analysis or workpapers of the results of this outreach.

RESPONSE 8:

SoCalGas engagement activities to date have focused on residential customers, as this customer class makes up the majority of the meter count in the Orange Cove demonstration area. However, SoCalGas has provided outreach to the Kings Canyon Unified School District, which supervises the schools in Orange Cove, as well as some leaders of individual schools in the city. SoCalGas has also engaged the Fresno County Transit Authority about potential fueling stations in the community.

Outreach materials provided to Kings Canyon Unified School District are provided as Attachment 01.

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QUESTION 9:

Please describe the types and quantity of businesses that constitutes the non-residential costumers that will be included in the Orange Cove pilot. Please provide whatever business type information So Cal Gas posses, for instance this may be in terms of NAIC code, qualitative descriptor (e.g., small retail, restaurant, etc.) or other information.

RESPONSE 9:

See question 7 regarding the number of non-residential customers that will be included in the Orange Cove demonstration. These businesses include the following NAICS Codes:

NAICSCODE

115114
221310
238210
311812
323114
423820
441310
441320
445110
445120
447110
452990
453310
453991
454390
485210
491110
517210
519120
522110
531120
541211
541213
561612
611110
621111
621210
621493

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622000
624120
624190
624410
722110
722211
722513
811111
812112
812220
812310
813110
921110
921190
922160
924120
926140

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QUESTION 10:

Please identify the number of customers in the proposed Orange Cove pilot that meet the definition of (a) small business customers under D.23-06-055 at 49 and (b) hard-to-reach small businesses (see p. 53).

RESPONSE 10:

SoCalGas objects to this request on the grounds it is unintelligible and appears to call for a legal conclusion. SBUA's reference to the definition of small businesses refers to SBUA's own recommendation on expanding SCE's existing criterion relating to small business customers' business size (i.e., fewer than 10 employees and/or classified as Very Small) to include commercial customers with 50 or fewer employees.¹⁰ Further, P.53 does not define what a hard to reach customer is--it provides common barriers to consider for program participation.¹¹ Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas has not surveyed the businesses in Orange Cove to determine whether they would meet various definitions.

¹⁰ D.23-06-055 at 49

¹¹ *Id.* at 53

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QUESTION 11:

Please list the appliances in use by non-residential customers that will be included in the Orange Cove pilot.

RESPONSE 11:

As with residential customers, SoCalGas has not conducted a full inventory of end uses in the Orange Cove community for non-residential customers at this time. SoCalGas does intend to offer courtesy inspections to non-residential customers as well as residential customers, which will help better document the non-residential appliances present. Further, SoCalGas will work with the community, including the business customers, to analyze the various end-uses and verify there are no known processes that would be impacted by hydrogen blends, even at the low percentages proposed for the demonstration.¹²

¹² Prepared Direct Testimony of Blaine Waymire on Behalf of Southern California Gas Company (Chapter 2, Open System Project) at 21

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QUESTION 12:

Please list the commercial appliances on which SoCal Gas has conducted hydrogen blending laboratory tests. Please describe the hydrogen blending test percentage, date of test, nature of test and summary of outcome.

RESPONSE 12:

SoCalGas understands “commercial appliances” to refer to non-residential, non-industrial equipment, and “laboratory tests” to refer to those SoCalGas performed at its Applied Technologies Laboratory. Please see table below.

Appliance	Blend Percentage	Test Date	Nature of Test	Summary of Outcome
Commercial Griddle	5%, 10%, 20%	June 2015	Evaluate safety, emissions, and cooking time.	• There were no operational or safety problems. • Slight reduction in emissions. • Slight increase in cooking times at 20% H2.
Commercial Range	5%, 10%, 20%	June 2015	Evaluate safety, emissions, and cooking time.	• No operational or safety problems were observed. • Slight reduction in emissions. • Increase in cooking times at 20% H2.
Commercial Oven	5%, 10%, 20%	June 2015	Evaluate safety, emissions, and cooking time.	• No operational or safety problems were observed. • Slight reduction in emissions. • Increase in cooking times at 20% H2.
Commercial Radiant Salamander Broiler	5%, 10%, 20%	June 2015	Evaluate safety, emissions, and cooking time.	• No operational or safety problems were observed. • Slight reduction in emissions. • Decrease in cooking times at 20% H2.

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Commercial Convection Oven (two models)	5%, 10%, 20%	Sept 2020	Evaluate safety, emissions, and efficiency	• No operational or safety problems were observed. • No significant changes in emissions • No significant changes in efficiency • Slight increase in cooking times at 20% H2.
Commercial Fryer (two models)	5%, 10%, 20%	Sept 2020	Evaluate safety, emissions, and efficiency	• No operational or safety problems were observed. • Slight decrease in emissions • No significant changes in efficiency • No significant changes to cooking times at 20% H2.
Commercial Broiler (two models)	5%, 10%, 20%	Sept 2020	Evaluate safety, emissions, and efficiency	• No operational or safety problems were observed. • Slight decrease in emissions for Broiler 1, Slight increase in emissions for Broiler 2 at 20% H2. • No significant changes in efficiency • No significant changes to cooking times at 20% H2.

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QUESTION 13:

Please describe the extent to which SoCal Gas anticipates that non-residential equipment in use in the Orange Cove pilot is the same or equivalent to the equipment tested in the lab (see prior question). Please provide any workpapers or other analysis supporting these expectations.

RESPONSE 13:

See response to Question 11 as it pertains to documentation of non-residential equipment. SoCalGas cannot make a determination whether the equipment present in Orange Cove is the same or equivalent to the equipment testing in SoCalGas's laboratory.

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QUESTION 14:

Please provide SoCal Gas' estimated expenditure on laboratory testing of the operation of non-residential appliances fueled by hydrogen blends.

RESPONSE 14:

SoCalGas objects to this request on the grounds it is outside the scope of this proceeding as determined in the June 12, 2025 Assigned Commissioner's Scoping Memo and Ruling and, accordingly, this request is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas further objects to this request on the grounds it is vague and ambiguous. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas understands this question to ask about the lab testing discussed in Question 12. The estimated expenditure related to this laboratory testing was \$265,000.

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QUESTION 15:

Has SoCal Gas' laboratory tests or research indicated that any particular type of appliance poses a higher risk of malfunction or safety issue as compared with other appliances? If yes, please explain.

RESPONSE 15:

SoCalGas objects to this request on the grounds it is vague and ambiguous and overly broad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas understands this question to pertain to hydrogen blends up to 5% by volume. SoCalGas is not aware of any appliances that pose a higher risk of malfunction or safety issue with 5% hydrogen blend.¹³

¹³ Response of Southern California Gas Company to Appendix B of Assigned Commissioner's Scoping Memo and Ruling at 8

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QUESTION 16:

D.22-12-057 states that pilots will be performed in a “closed system.” How does SoCal Gas intend to ensure that the Orange Cove project complies with this requirement?

RESPONSE 16:

As outlined in the Joint IOUs’ response to intervenor’s motion to dismiss the application, the project design is intended to simulate blending into an open system, while still maintaining total system isolation and control of the hydrogen blends, which is why it is referred to as an “open system project.”¹⁴ Because the proposed portion of the distribution system is fed by only one regulator station, the area is under controlled conditions in a totally isolated portion of the distribution system, and in that sense is truly a “closed system.”¹⁵

¹⁴ Joint Opposition of Southern California Gas Company, San Diego Gas & Electric Company, Pacific Gas & Electric Company, and Southwest Gas Corporation to Joint Motion to Dismiss; at 22

¹⁵ *Id.*

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QUESTION 17:

Has SoCal Gas, directly or through any consultant, contacted the authors or participants in the HyDeploy Report for the pilot project at Keele University to gain additional or background information not contained in the report? If yes, please either provide copies of the communications or describe the communications and the nature of the information obtained.

RESPONSE 17:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome given the short period of time provided for a response. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

To the best of SoCalGas's knowledge at this time, no.

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QUESTION 18:

Has SoCal Gas contacted, directly or through a consultant, the authors or participants in any other hydrogen blending pilot projects outside of California in connection with designing the UC Irvine and Orange Cove pilot projects?

Response 18:

SoCalGas has not contacted, directly or through a consultant, the authors or participants in any other hydrogen blending pilot projects outside of California in connection with designing the UC Irvine and Orange Cove pilot projects, specifically. SoCalGas has engaged with ATCO Canada, but discussions did not include project design for the Orange Cove or UC Irvine projects. ATCO participated in a Joint IOU workshop to provide additional information about their demonstration project to stakeholders. The Joint IOU workshop presentation is provided is attachment ¹⁶

¹⁶ Joint Utilities Hydrogen Blending Pilot Project Stakeholder Workshop at 46-61

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QUESTION 19:

If yes, please describe the out-of-state pilots, outreach and nature of information obtained.

RESPONSE 19:

SoCalGas has not solicited feedback on UC Irvine or Orange Cove project designs from utilities hosting out of state hydrogen blending demonstrations. However, SoCalGas will seek independent third-party review of data collection plan and safety of design for its proposed project design during Phase I.¹⁷

SoCalGas is aware of several demonstration projects, which were compiled into the Hydrogen Blending Compendium Report.¹⁸

¹⁷ *Southern California Gas Company (SoCalGas)*, Response to Appendix B of Assigned Commissioner's Scoping Memo and Ruling, Application (A.) 22-09-006, August 11, 2025, at pp. 10, 14,15, 25, 31

¹⁸ See Hydrogen Blending Compendium Report, Summary of Regulatory Proceedings P.2-10; available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M556/K896/556896659.PDF>

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QUESTION 20:

Does SoCal Gas agree that customers will likely be required to purchase any greater volume of hydrogen blended gas as compared with the current blend to meet the same appliance needs? If not, please explain.

RESPONSE 20:

Yes; however, customers within the demonstration area are not expected to see higher bills based on their usage because of the demonstration. As explained in Chapters 1 and 2 testimony, since the introduction of hydrogen has the potential to change the heating value of the gas supplied to the customer, SoCalGas plans to apply retroactive volumetric adjustments to applicable customer bills to accurately charge residents and businesses based on therm usage.¹⁹ SoCalGas intends to address this directly with customers during project implementation.

¹⁹ Prepared Direct Testimony of Blaine Waymire on behalf of SoCalGas (SoCalGas's Hydrogen Blending Demonstration - Closed System Project) (Chapter 1) and Prepared Direct Testimony of Blaine Waymire on behalf of SoCalGas (SoCalGas's Hydrogen Blending Demonstration - Open System Project) (Chapter 2) at 14

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QUESTION 21:

Has SoCal Gas estimated the extent to which customers served by the Orange Cove pilots will be required to purchase a greater volume of hydrogen blended gas to meet current operational needs?

RESPONSE 21:

See response to question 20. SoCalGas will adjust billing factors so that customers are charged based on their total energy use, consistent with current billing practices irrespective of volume.

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QUESTION 22:

Has SoCal Gas estimated the total customer bill impact of hydrogen blending on customers located within the Orange Cove pilot?

RESPONSE 22:

See response to Questions 20 and 21. SoCalGas will adjust bills so that customers are accurately charged for the energy usage they consume. As such, SoCalGas does not expect any customer bill impacts due to changes in volumetric consumption from the hydrogen blends.²⁰

If the pilot projects are authorized at the cost levels identified in the Amended Application, all customers across the SoCalGas territory, not just customers within the Orange Cove demonstration area, will have bill impacts, as described in testimony.²¹

²⁰ *Id.*

²¹ Prepared Direct Testimony of Nasim Ahmed and Marjorie Schmidt-Pines on behalf of SoCalGas (Chapter 6) at 5.

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QUESTION 23:

Does SoCal Gas intend to measure the extent to which customers in the Orange Cove pilot are required to purchase a greater volume of gas to meet their needs? Please explain how this will be evaluated.

RESPONSE 23:

Yes, SoCalGas intends to measure gas volumes in the system to evaluate the impact to volumetric flow rates to meet energy needs. SoCalGas will establish a detailed data collection plan with an independent third party, which will further define how impacts to volumetric flow rates are measured.²²

²² Prepared Direct Testimony of Blaine Waymire on Behalf of Southern California Gas Company (Chapter 2, Open System Project) at 24

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QUESTION 24:

Has SoCal Gas included this cost as part of the project cost? If yes, please explain and cite to applicable portions of the testimony or application.

RESPONSE 24:

As explained in response to Questions 20-23, no incremental cost to the customer is expected specifically tied to their usage of a blended gas.²³

²³ *Id.*

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QUESTION 25:

Does SoCal Gas intend to offer customers a credit or rebate to ensure that the pilot is cost neutral to customers in Orange Cove? If yes, please describe how Orange Cove intends to implement this credit or rebate.

RESPONSE 25:

See response to Question 20. SoCalGas will adjust bills so customers are adequately charged on an energy basis.

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QUESTION 26:

Has SoCal Gas considered the potential impact of hydrogen blending on the problem of stranded assets as customers electrify their operations? If yes, (a) please provide any workpapers or analysis. (b) Please describe any way in which the Orange Cove pilot may contribute to understanding this issue. Please provide any workpapers or analysis.

RESPONSE 26:

SoCalGas objects to this request on the grounds it is outside the scope of this proceeding as determined in the June 12, 2025 Assigned Commissioner's Scoping Memo and Ruling and, accordingly, this request is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to this request on the grounds it calls for speculation and appears to be premised on speculation.

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QUESTION 27:

Has SoCal Gas considered the where hydrogen blending equipment should be sited in order to facilitate efficient targeted gas system decommissioning? If yes, (a) please provide any workpapers or analysis. (b) Please describe any way in which the Orange Cove pilot may contribute to understanding this issue. Please provide any workpapers or analysis.

RESPONSE 27:

SoCalGas objects to this request on the grounds it is outside the scope of this proceeding as determined in the June 12, 2025 Assigned Commissioner's Scoping Memo and Ruling and, accordingly, this request is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure.

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QUESTION 28:

Please explain how the SoCal Gas UC Irvine and Orange Cove projects address different issues or obtain different information than the SW Gas Truckee pilot.

RESPONSE 28:

See attachment with a presentation to Energy Division in 2024 after the Joint IOU group filed their amended application, which explains how the proposed demonstrations are differentiated, yet complementary.²⁴ The UC Irvine and Orange Cove projects address different weather conditions. The proposed project at UC Irvine will demonstrate hydrogen blending in coastal climate conditions, while the proposed project in Orange Cove would demonstrate hydrogen blending in mediterranean climates. SW Gas's proposed demonstration in Truckee, California would demonstrate hydrogen blending in extreme weather conditions, which includes some of the coldest climates experienced in California and high elevations. Further, SW Gas uses primarily High-Density Polyethylene (HDPE) in their medium pressure distribution system, while SoCalGas and San Diego Gas & Electric (SDG&E) use primarily medium-density polyethylene (MDPE). SW Gas's project will demonstrate hydrogen blending in HDPE, while SoCalGas and SDG&E projects will demonstrate hydrogen blending in MDPE. Please note, minor modifications to the projects have been made since the date of the presentation, but do not-impact the scope of demonstration conditions.

²⁴ Attachment Energy Division Briefing: Joint Amended Application to Establish H2 Blending Demonstration Projects, slide 8

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QUESTION 29:

How does SoCal Gas intend to share information from its pilot project sought to be funding in this application with other utilities participating in this application?

RESPONSE 29:

SoCalGas Chapters 1 and 2 testimony explain that Phase 4 of the proposed demonstration projects is dedicated to data analysis and dissemination, in which “the Applicants will work accordingly with any selected independent research organizations to provide necessary data and coordinate results that can published for independent evaluation”.²⁵ SoCalGas expects the Commission will provide further requirements regarding a reporting process. Additionally, the Joint IOUs hold regular meetings and touchpoints, and SoCalGas expects these will continue. SoCalGas also intends to share additional pilot project data with the Joint IOU teams, as needed, to support their internal assessments.

QUESTION 30:

²⁵ Prepared Direct Testimony of Blaine Waymire on behalf of SoCalGas (SoCalGas’s Hydrogen Blending Demonstration - Closed System Project) (Chapter)at 15; Prepared Direct Testimony of Blaine Waymire on behalf of SoCalGas (SoCalGas’s Hydrogen Blending Demonstration - Open System Project) (Chapter 2) at 15

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How does SoCal Gas intend to obtain information about the other utilities' hydrogen blending pilot projects in this application?

RESPONSE 30:

See response to Question 29.