Company: Southern California Gas Company (U 904 G)
Proceeding: Gas Line Extension Allowance Application
Application: A.25-07-001
Exhibit No.: SCG-05
Witness: Jason Legner

# PREPARED REBUTTAL TESTIMONY OF

# JASON LEGNER

# (CHAPTER 2 – SELECTED PROJECTS)

**BEFORE THE PUBLIC UTILITIES COMMISSION**

**OF THE STATE OF CALIFORNIA**

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**TABLE OF CONTENTS**


I. INTRODUCTION (PURPOSE) ..... 1

II. GENERAL REBUTTAL ..... 1

III. REBUTTAL OF SIERRA CLUB'S TESTIMONY ..... 2

A. The Commission Has Addressed How Qualifying RNG Projects Should Be Considered to Receive Line Extension Allowances Outside of a Categorical Exemption ..... 2

B. Customer Projects Are Consistent with California's Climate Goals, Including Those Articulated in SB 32 ..... 3

C. Customer Projects Have Demonstrated That There Is No Feasible Alternative ..... 5

D. Customer Projects Support California Policy, Including Air Quality Standards ..... 6

IV. REBUTTAL OF CAL ADVOCATES'S TESTIMONY ..... 8

A. Customer Projects Have Demonstrated a Reduction in GHG Emissions ..... 8

B. Customer Projects Align with California's Climate Goals ..... 9

C. Customer Projects Have Demonstrated That There Is No Feasible Alternative ..... 11

V. CONCLUSION ..... 12

# Prepared Rebuttal Testimony of
# Jason Legner

## I. INTRODUCTION (PURPOSE)

The purpose of my rebuttal testimony is to address the arguments in opening testimonies served by Sierra Club and Public Advocates Office (Cal Advocates) on November 14, 2025, as they relate to my direct testimony in Southern California Gas Company's (SoCalGas or SCG) Application (A.) 25-07-001.[1]

## II. GENERAL REBUTTAL

SoCalGas disagrees with the testimonies submitted by the Sierra Club and Cal Advocates recommending that the California Public Utilities Commission (Commission or CPUC) deny all customer applications or, as proposed by the testimony submitted by the Cal Advocates, all but one project. SoCalGas does not seek to relitigate Decision (D.) 22-09-026; rather, it is submitting individual customer applications in good faith in accordance with the process specified by the Commission. It is correct that D.22-09-026 did not grant a categorical exemption for Compressed Natural Gas (CNG)/Renewable Natural Gas (RNG) projects. This was, in part, because it remained unclear if near-term gas line allowances were necessary to move projects forward until such a time that Electric Vehicle (EV) trucks and the associated infrastructure continued to expand. Therefore, CNG/RNG projects needing to request line allowances were directed to do so under the standard application process created within the Decision—which the Application does.[2] In fact, the Commission recognized that for now, RNG plays an important role in reducing greenhouse gas (GHG) emissions and D.22-09-026 was not intended to conflict with the policy, as outlined in D.22-02-025.[3] As noted by the testimonies submitted by both the Sierra Club and Public Advocates Office, the targets set by California for this expansion, where feasible, in industrial transportation is over the next 20 years.[4]

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1 SCG-02 (Legner).

2 D.22-09-026 at 54-56.

3 *Id.* at 55n. 108.

4 Cal Advocates (Zhang) at 6; Sierra Club (Vespa/Belcher) at 4.

Furthermore, D.22-09-026 identified that large non-residential customers are the most significant contributors to GHG emissions,[5] however, these gas line extension projects do not account for such projects. To the contrary, each project, making use of renewable fuel sourced from traditional waste streams, will significantly reduce GHG emissions in the hard-to-decarbonize sector. Contrary to the testimonies provided by Sierra Club and Cal Advocates, each individual project application has provided the necessary information to demonstrate compliance with the minimum requirements set forth in D.22-09-026. This includes a reasonable demonstration of why the customer has no feasible alternatives to the use of natural gas for their project and that the project supports California climate goals, including those specified in Senate Bill (SB) 32, which mandates a 40% reduction in GHG emissions below 1990 levels by 2030.[6] Neither intervenor disputes the California policies cited by customers or within the opening testimonies submitted by SoCalGas; however, they find the projects misaligned with a recent executive order establishing 2045 zero emission vehicle (ZEV) targets where feasible, which has not yet been fully translated into actionable public policy guidance, nor does it mandate any immediate prohibition on the use of RNG in these types of industrial transportation use cases. Cal Advocates arbitrarily recommends denying eight of the nine initial applications, approving only one because it includes a long-term fleet electrification plan. This position contradicts their broader argument that the other eight projects fail to meet the minimum threshold for approval at present. To the contrary, as California establishes the policies necessary to meet long-term goals, these types of key solutions in the hard-to-decarbonize sector will provide GHG emission reduction benefits today that align with California's broader long-term policies. These points are discussed in greater detail below.

## III. REBUTTAL OF SIERRA CLUB'S TESTIMONY

### A. The Commission Has Addressed How Qualifying RNG Projects Should Be Considered to Receive Line Extension Allowances Outside of a Categorical Exemption

As discussed in the rebuttal testimony of Jennifer Morris, Sierra Club's interpretation of D.22-09-026 is incorrect, and its assertion that SoCalGas is attempting to relitigate that

[5] D.22-09-026 at 77 (FOF 23).

[6] SCG-02 (Legner) at JL-4.

Decision is misleading. While D.22-09-026 did deny Clean Energy's request for a categorical exemption, the Decision explicitly recognized that the new application process for line allowances prescribed in the Decision can support RNG/CNG facilities. In fact, the Commission agreed with Clean Energy that CNG, RNG, and hydrogen are preferred alternatives to diesel and other higher-emission fuels during the transition to full electrification, which the California Air Resources Board (CARB) has targeted for over the next 20 years.[7] That Decision did not deny the categorical exemption due to concerns over the benefits of RNG use in transportation; rather, it questioned the necessity of longer-term allowances once EV trucks and infrastructure are built out. Accordingly, the Decision directed that CNG/RNG fueling stations that require line allowances should be evaluated individually under the standard application process established in that same Decision.[8] The Decision also states that the Commission will review the applications received over the next several cycles and may revisit the need for categorical exemptions in the future.[9] SoCalGas is not attempting to relitigate D.22-09-026, but rather is in compliance with the prescribed application process and acting in good faith on behalf of its customers seeking line allowances specifically contemplated by and consistent with that Decision.

### B. Customer Projects Are Consistent with California's Climate Goals, Including Those Articulated in SB 32

The customer projects put forth by SoCalGas support the ambitious climate and air quality goals set by California, including those set in SB 32 that mandate a 40% reduction in GHG emissions below 1990 levels by 2030.[10] These are outlined in the testimony submitted with the Application.[11] To meet these goals, it will be necessary to utilize all resources available today as we work to transition the hard-to-decarbonize industrial transportation sector. All the line allowance applications submitted by SoCalGas represent RNG fueling stations that will advance California's climate objectives both in the near term and are also in

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7 D.22-09-026 at 55.

8 *Id.* at 55-56.

9 *Id.* at 58.

10 SB 32, California Global Warming Solutions Act of 2006: emissions limit (Pavley, 2016), *available at:* https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.

11 SCG-02 (Legner) at JL-4-JL-6.

alignment with the state's long-term goals. The testimony of Sierra Club cites that CARB determined in its 2022 Scoping Plan for Achieving Carbon Neutrality (2022 CARB Scoping Plan) that vehicles must transition to zero-emission technology to decarbonize the transportation sector.[12] This was in response to Executive Order (EO) N-79-20. At that time, CARB found that The Advanced Clean Cars II regulation fulfilled the goal in that EO and served as the primary mechanism to help deploy ZEVs.[13] The 2022 CARB Scoping Plan referenced the same EO in setting targets for transitioning the medium- and heavy-duty fleet to zero emissions by 2045 for buses and heavy-duty long-haul trucks "where feasible."[14] However, since that time, EO N-27-25 was issued based on the disapproval of the waivers of the federal preemption of California granted under the Clean Air Act for California's Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Omnibus regulations. That EO called for CARB to establish a new regulation for medium- and heavy-duty vehicles, the Advanced Clean Cars III regulation, to fulfill the goal of this new EO.[15] This regulation has yet to be established. In fact, CARB is actively holding workshops for public comments to develop that regulation; therefore, it is premature to speculate on it at this time. Moreover, the ongoing uncertainty surrounding these changing policies has created the same uncertainty for fleet owners, leading many to retain their diesel vehicles for extended periods.[16] Conversely, the projects proposed in the Application will operate exclusively on RNG and will be aligned with the EO that mandates CARB to reduce GHG emissions and criteria air pollutants while establishing a framework to accelerate longer-term progress towards the deployment of clean air vehicles and technologies in the state.[17]

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[12] Sierra Club (Vespa/Belcher) at 4.

[13] CARB, 2022 Scoping Plan Update at 185, *available at: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf*.

[14] *Id.*

[15] EO N-27-25 at 2.

[16] For instance, CARB formally withdrew its waiver request from EPA for the Advanced Clean Fleet Regulation on January 13,2025 and sued Clean Truck Partnership on October 27,2025. *See* https://www.epa.gov/system/files/documents/2025-01/ca-acf-carb-withdrawal-ltr-2025-1-13.pdf. *See also* CARB sues major truck manufacturers for breaching Clean Truck Partnership Truck OEMs Score Win Over CARB in Clean Trucks Lawsuit - TT.

[17] EO N-27-25 at 2.

### C. Customer Projects Have Demonstrated That There Is No Feasible Alternative

The testimony presented by the Sierra Club offers sweeping statements regarding industrial solution feasibility that they believe should be universally accepted and arbitrarily argues that customers should be required to present additional evidence beyond that provided to demonstrate feasibility consistent with each project's business needs. Each individual project application has presented detailed business use cases for their projects and a detailed explanation to demonstrate why the RNG fueling station is the only feasible solution to meet the customer's needs. For instance, Project A, as a business model, requires either CNG or RNG fueling. There is no alternate solution (feasible or otherwise) that would allow for the testing and delivery process outlined in the customer application. Project D, diverting landfill waste for RNG in support of SB 1383, found that EV options offer limited range stemming from high ancillary hydraulic loads required to lift and compact the refuse, and hydrogen fuel cell refuse collection trucks are not commercially available. Projects B and E will serve existing fleets that have existing useful life remaining. There is no alternative method of fueling these existing vehicles. Similarly, Projects G and H are public RNG fueling stations needed to serve the existing market of CNG vehicles. Notably, the RNG station being installed for Project G will complement other onsite fueling options, including renewable biodiesel and EV charging. This type of multi-use fueling facility will be critical to serving California's transitioning industrial fleets. Only one project, Project C, identified renewable diesel as a possible, albeit less feasible option. And, in fact, renewable diesel falls short of achieving the carbon-negative lifecycle performance of RNG and still emits similar NOx and PM emissions as conventional diesel.[18] Nevertheless, the testimony of Sierra Club attempts to use this customer-specific scenario to arbitrarily deem renewable diesel as a viable universal customer solution – regardless of each individual and unique customer use case presented. This is disingenuous and ignores the detailed information provided by each customer and the individual project application process established by D.22-09-026. The customer applications put forth by SoCalGas demonstrate their rigorous due diligence and demonstrate why RNG fueling is the feasible option to meet their business needs.

[18] SCG Reply to Protest at 4.

### D. Customer Projects Support California Policy, Including Air Quality Standards

Contrary to the air quality concerns presented by Sierra Club,[19] the project applications for RNG fueling stations do in fact support California policy, as required by D.22-09-026, as it relates to air quality standards. Recent reporting shows that there are air quality and NOx benefits that result from ultra-low NOx medium- and heavy-duty RNG-fueled trucks. In March 2025, Energy Vision released a report evaluating the reductions in NOx and fine particulate matter (PM2.5) emissions achieved by replacing pre-2013 heavy-duty diesel trucks with alternatives.[20] The study found that replacing pre-2013 heavy-duty diesel trucks with new CNG models running on RNG can cut NOx emissions by over 94% and PM2.5 by nearly 43%.[21] In addition, the report concluded that trucks powered by RNG compared to the other clean alternatives offer the most comprehensive benefits, delivering substantial reductions in air pollutants while remaining cost-effective, high-performing, and readily available today.[22]

The testimony put forth by Sierra Club cites CARB's fact sheet on emissions from CNG heavy-duty vehicles, based on a study of more than 200 trucks, to argue that low-NOx natural gas engines perform worse in real-world conditions than their certification levels under Portable Emissions Measurement System (PEMS) testing.[23] The final report from the 200-truck study confirmed high variability in NOx emissions across vocations and engine technologies was expected since the PEMS results were average over an entire test day.[24] It

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[19] Sierra Club (Vespa/Belcher) at 9-10.

[20] Michael S. Lerner, *A Path to a Healthier America: Ditching Old Diesel Trucks* (Mar. 2025), Energy Vision, *available at*: https://energy-vision.org/pdf/ditching-diesel.pdf.

[21] *Id.*

[22] *Id.*

[23] Sierra Club (Vespa/Belcher) at 9-10.

[24] Jonathan Leonard, Patrick Couch, Thomas D. Durbin, Ph.D., Kent Johnson, Ph.D., Arvind Thiruvengadam, Ph.D., March Besch, Ph.D., Sam Cao, Ph.D., *In-Use Emissions Testing and Activity Profiles for On-Road Heavy-Duty Vehicles: Summary of 200 Heavy Duty Vehicle Emissions Testing Program from the University of California, Riverside and West Virginia University* (Mar. 2023), California Energy Commission, *available at*: In-Use Emissions Testing and Activity Profiles for On-Road Heavy-Duty Vehicles: Summary of 200 Heavy-Duty Vehicle Emissions Testing Program from the University of California, Riverside and West Virginia University | California Energy Commission at 78.

also noted that most outliers significantly above certification levels were mainly due to systematic and duty cycle issues.[25] Furthermore, Sierra Club's interpretation overlooks the broader context provided in a related research paper, also available on CARB's website, which analyzed a subset of those vehicles.[26] Although real-world emissions were generally higher than the certification standards (which are conducted under controlled environmental conditions) across all engine categories (including diesel, CNG, diesel hybrid electric, and liquified petroleum gas vehicles), the data showed clear trends that, as emission standards became stricter, actual in-use emissions declined significantly.[27] In fact, the study found substantial real-world NOx reductions compared to diesel vehicles: 75% for 0.2 grams per brake horsepower-hour (g/bhp-hr) CNG engines and 94% for 0.02 g/bhp-hr CNG engines.[28]

Furthermore, the United States Environmental Protection Agency (EPA) currently mandates that heavy-duty engines must maintain PM emissions below 0.01 g/bhp-hr[29] and, on December 20, 2022, the EPA adopted the "Control of Air Pollution from New Motor Vehicles: Heavy Duty Engine and Vehicle Standards" rule, which lowers the PM limit to 0.005 g/bhp-hr for model-year 2027 and beyond.[30] This standard aligns with CARB's Omnibus regulation for heavy-duty engines starting in the 2024 model-year; both are currently under active review and reconsideration by the EPA.[31] Since CNG vehicles are required to meet strict federal and state emission standards, the concerns put forth by Sierra Club are misplaced.

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[25] *Id.* at 8.

[26] Cavan McCaffery, Hanwei Zhu, Tianbo Tang, Chengguo Li, Georgios Karavalakis, Sam Cao, Adewale Oshinuga, Andrew Burnette, Kent C. Johnson, and Thomas D. Durbin, *Real-world NOx emissions from heavy-duty diesel, natural gas, and diesel hybrid electric vehicles of different vocations on California roadways*, ScienceDirect (Aug. 25, 2021) at 1, *available at*: https://www.sciencedirect.com/science/article/abs/pii/S0048969721022956?via%3Dihub.

[27] *Id.* at 10.

[28] *Id.* at 1.

[29] "USA:Heavy-Duty Onroad Engines." Emission Standards, *available at*: Emission Standards: USA: Heavy-Duty Onroad Engines

[30] *Id.*

[31] California Air Resources Board, *Heavy-Duty Omnibus Regulation Fact Sheet*, available at: Heavy-Duty Omnibus Regulation Fact Sheet | California Air Resources Board.

## IV. REBUTTAL OF CAL ADVOCATES'S TESTIMONY

### A. Customer Projects Have Demonstrated a Reduction in GHG Emissions

The testimony presented by Cal Advocates states, without citation, that "to comply with D.22-09-026, SCG must provide qualitative and quantitative evidence."[32] However, this requirement is not found in D.22-09-026; that decision requires demonstration that projects will lead to certain outcomes.[33] The customer applications, along with SoCalGas's evaluations, satisfy this threshold by outlining a conservative approach for measuring emissions reductions that is firmly rooted in existing California policy standards for estimating GHG emission savings. Furthermore, the argument that SoCalGas's evidence is "speculative" is itself speculative and misinterprets the nature of infrastructure planning at the early stages of a project when a customer is requesting consideration of a line-extension allowance. In these types of planning matters, forward-looking modeling and assumptions based on credible methodologies are sufficient to meet the requirements established in D.22-09-026. SoCalGas's application includes such analyses for estimating GHG reductions, which is aligned with the CARB's Low Carbon Fuel Standard (LCFS) Program and supported by market data demonstrating the widespread, and growing, use of RNG in California's transportation sector.

The assertion that GHG reductions are only achievable if customers procure an adequate low-carbon RNG source overlooks the broader emissions benefits inherent in the fuel transition. The testimony presented by Cal Advocates states that GHG reductions are only achievable if customer estimates of annual RNG consumption are accurate because reductions depend on the volume of diesel displaced by RNG. However, significant GHG reductions will occur *regardless* of exact RNG volumes when compared to diesel or other alternative fuels. Bio-CNG currently holds the lowest average carbon intensity of any clean fuel option on California's roadways today and is the only fuel producing a negative carbon intensity fleet outcome in the CARB's LCFS Program, which includes ethanol, biodiesel,

[32] Cal Advocates (Zhang) at 1-3.

[33] D.22-09-026 at 57.

renewable diesel, bio-CNG, bio-liquefied natural gas, electricity, alternative jet fuel, and hydrogen.[34]

The concern that customers may utilize fossil gas in the absence of an adequate supply of low-carbon RNG is also misplaced.[35] Historical trends strongly indicate otherwise. In 2024, 99% of all on-road fuel used in natural gas vehicles in California was RNG, driven by the state's LCFS Program, and RNG use as transportation fuel in California increased 44% over the last five years.[36] SoCalGas's conservative methodology of using an average carbon intensity reasonably reflects achievable GHG reductions and aligns with LCFS-certified pathways.[37] Furthermore, while sourcing RNG with the lowest carbon intensity maximizes reductions, this does not eliminate GHG emission reductions that would still be realized under *all* other RNG pathways. Lifecycle carbon intensity (CI) data from the LCFS Program demonstrates that, on average, RNG derived from manure (-427.1 $gCO_2e/MJ$), food waste (-25 $gCO_2e/MJ$), wastewater (34.8 $gCO_2e/MJ$), and even RNG from landfill gas (47.9 $gCO_2e/MJ$) delivers lower emissions than diesel at 100.6 $gCO_2e/MJ$.[38] In fact, even in the unlikely event that customers utilized fossil gas, LCFS current pathways show that the average carbon intensity of CNG in North America is 79.21 $gCO_2e/MJ$, which is still significantly lower than diesel and would still result in a reduction in GHG emissions.[39]

**B. Customer Projects Align with California's Climate Goals**

California's climate goals, as articulated in EOs N-79-20 and N-27-25, aim for 100% sales of new zero-emission medium- and heavy-duty trucks by 2045 where feasible.[40] These

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[34] Coalition for Renewable Natural Gas, *Bio-CNG Fueled Fleets in California Achieving Carbon-Free Footprint Today*, Biomass Magazine (June 2024), *available at:* Bio-CNG fueled fleets in California achieving carbon-free footprint today | Biomass Magazine.

[35] Cal Advocates (Zhang) at 1-5.

[36] The Transport Project, RNG Coalition, California Renewable Transportation Coalition, *Decarbonizing California Fleets with Renewable Natural Gas (RNG) Transportation,* (Aug. 2025), *available at:* NGV RNG Driving Down.

[37] SCG-02 (Legner) at JL-2-JL-4.

[38] Michael S. Lerner, *A Path to a Healthier America: Ditching Old Diesel Trucks* (Mar. 2025), Energy Vision, *available at*: https://energy-vision.org/pdf/ditching-diesel.pdf.

[39] California Air Resources Board, *Compressed Natural Gas from Pipeline Average North American Fossil Natural Gas CI (CNG000L00072019)* (downloaded 12/15/2025), *available at: https://ww2.arb.ca.gov/resources/documents/lcfs-pathway-certified-carbon-intensities.*

[40] EO N-79-20 at 2; EO N-27-25 at 2.

are long-term targets, not immediate prohibitions. Additionally, given the uncertainty of the Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Omnibus regulation established pursuant to EO N-79-20, CARB was directed in EO N-27-25 to propose an Advanced Clean Cars III regulation to include light-duty trucks and medium- and heavy-duty vehicles to advance progress towards the deployment of clean air vehicles and technologies in the state.[41] However, that Advanced Clean Cars III regulation has not yet been established. It remains unclear what state mandates will be presented to effectuate the executive order through this forthcoming regulation. However, the state's strategy explicitly includes near-zero technologies and renewable fuels as interim measures to reduce emissions while infrastructure for full electrification scales up. In fact, as of last year, the LCFS program has reduced the carbon intensity of California's fuel mix by almost 13%, displacing 70% of the diesel used in the state with cleaner alternatives.[42] CNG vehicles, particularly when paired with RNG, can achieve significant lifecycle GHG reductions compared to diesel, aligning with California's near-term climate objectives.[43] The claim that projects "do not contain a plan to eventually incorporate zero-emission technologies" overlooks the fact that RNG and hydrogen blending pathways are integral to California's decarbonization roadmap. The CPUC and CARB have acknowledged that these fuels provide critical emission reductions during the transition period, especially in sectors where electrification faces technical or economic barriers.[44] Ultimately, these customer projects support California's phased approach to carbon neutrality, including the goals established by SB 32, and comply with D.22-09-026 as they demonstrate measurable GHG reductions using RNG and advanced low-NOx CNG engines which provide air quality benefits. All projects enable continued near-term decarbonization and address certain individual feasibility constraints that make immediate electrification

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41 EO N-27-25 at 2.

42 California Air Resources Board, *CARB updates the Low Carbon Fuel Standards to increase access to cleaner fuels and zero emission transportation options*, (Nov. 2024), *available at:* https://ww2.arb.ca.gov/news/carb-updates-low-carbon-fuel-standard-increase-access-cleaner-fuels-and-zero-emission.

43 SB 32, California Global Warming Solutions Act of 2006: emissions limit (Pavley, 2016), *available at:* https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.

44 D.22-09-026 at 55n. 108.

impractical, especially in the hard-to-decarbonize medium- and heavy-duty transportation sectors.

### C. Customer Projects Have Demonstrated That There Is No Feasible Alternative

Cal Advocates asserts that SoCalGas does not provide adequate evidence to determine the infeasibility of alternate solutions. However, D.22-09-026 does not specifically require the submission of such customer evidence. Rather, the Decision requires that the customer demonstrate no feasible alternative, and the customers have done so in their line allowance applications. Immediate conversion to ZEV fleets—which is what Cal Advocates suggests—is not feasible for all customers due to cost, technology maturity, and charging infrastructure limitations. Moreover, some of the fueling stations being considered are being installed to serve existing private and/or public trucking fleets with useful life remaining. For example, Project A, as a business model, requires the use of CNG or RNG for testing and delivery of the vehicles.[45] No alternate fueling system will serve the needs of their business use case. The fueling stations requested for Projects B (accepted by Cal Advocates) and E will serve existing fleets of CNG trucks with remaining useful life—no alternative solution exists for fueling these existing fleets of vehicles. The applicants do note that the fueling station will also allow them to adopt additional RNG vehicles in lieu of diesel, where an immediate transition to EV may not be feasible for the reasons stated in the customer application. Projects C and D (D1 & D2) identified range and infrastructure limitations preventing the adoption of EV or hydrogen solutions at present. Notably, the customer for the two (2) Project D applications is also directly supporting SB 1383 by diverting organic waste from landfills specifically for RNG fueling.[46] Projects G and H are public RNG fueling stations needed to serve the existing market of CNG vehicles on the road today, and the RNG station being installed for Project G will complement other onsite fueling options, including renewable biodiesel and EV charging. This type of multi-use fueling facility will be critical to serving California's transitioning industrial fleets. Imposing an overly burdensome standard on customers could stifle progress and contradict the intent of D.22-09-026, which is to guide—not halt—low-carbon infrastructure development to further California's

[45] Business use case provided in confidential version Jason Legner's Direct Testimony.

[46] Business use case provided in confidential version Jason Legner's Direct Testimony.

decarbonization goals, and promote alternative clean fuels.[47] The project applications seeking line allowances are aligned with those goals and meet the criteria set forth in the Decision for consideration.[48]

## V. CONCLUSION

This concludes my prepared rebuttal testimony.

[47] D.22-09-026 at 44.

[48] *Id.* at 57.