

**SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)**  
**Cal Advocates-SCG-A2510008-001**  
**Woody Biomass Pilot Project application (A.25-10-008)**  
**DATE REQUESTED: December 8, 2025**  
**RESPONSE DUE: January 9, 2025**

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**QUESTION 1:**

SoCalGas presents the GREET analysis for the proposed pilot project in Table 1 (p. JL-15), Table 2 (p. JL-16), Table 3 (p. JL-17), and Attachment 1 of Prepared Direct Testimony of James Lucas. Provide the full life-cycle GREET model for the proposed pilot project in Excel format. The Excel spreadsheet should include, but not be limited to, active cells and formulas for the following information:

- a. Baseline carbon intensity and criteria pollutant biomass types, base case disposal methods, and Bio-SNG use case carbon intensity and criteria pollutants with and without carbon capture and storage (CSS).
- b. The methodology used to express baseline carbon intensity and criteria pollutant emissions on a basis of potential megajoule of biosynthetic natural gas (Bio-SNG) production.
- c. Delineated calculations by the production steps.
- d. Well-to-wheel (WTW) carbon intensity for compressed Bio-SNG fuel (Bio-CNG).
- e. The sources and assumptions used to determine the biogenic CO<sub>2</sub> credit of -55.0 gCO<sub>2</sub>e/MJ assigned.
- f. Document the sources of data, emission factors, and other assumptions, including but not limited to any source testing, permits, manufacturer certifications, technical reports, or models used to support the analysis.

**RESPONSE 1:**

Responses below are from Matt D. Summers

An Excel workbook with active cells will be provided concurrently with a confidentiality declaration in accordance with Decision ("D.") 21-09-020 and General Order ("GO") 66-D Revision 2.

- a) Both the base case and the use case results can be traced from the sheets "Baseline Case" and "Bio-SNG Use Case" respectively.
- b) The calculations can be traced on the sheet "Baseline Case".
- c) These steps are delineated on sheet "Bio-SNG Use Case".
- d) The WTW results are shown on sheet "WTW".
- e) This is shown on sheet "WTW" and represents the avoided fossil CO<sub>2</sub> emissions from CNG combustion during CNG vehicle operation, directly obtained from R&D GREET 2024. This figure assumes that non-CO<sub>2</sub> emissions would not necessarily be avoided in the Bio-SNG case (i.e., VOC, CO).
- f) The sources for the emissions factors have been shared in other testimony and are noted in the workbook

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**QUESTION 6:**

Provide a breakdown in Excel format of the estimated costs associated with the construction, operation, and maintenance of the pilot's Utility-Owned Infrastructure (lanes 7, 8, and 9) by lane, including estimations of engineering costs, equipment and materials, construction, labor, and/or any other applicable cost categories. Include a line item for costs associated with the construction, operation, and maintenance of gathering pipeline laterals, if applicable.

**RESPONSE 6:**

Estimated costs for Lanes 7, 8, and 9 are based on a Class 5 estimate. A Class 5 estimate can range from -50% on the low side to +100% on the high side. The provided costs are preliminary estimates based on the project description. The estimate was developed using historical data from comparable Renewable Natural Gas Point-Of-Receipt facility projects, recent budgetary vendor quotes, and assumptions about project design and construction. These ranges encompass anticipated costs for engineering, equipment and materials, construction, labor, and other applicable categories. See supporting Excel file for estimated costs breakdown.