

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: December 22, 2025

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 CO₂ credit of -55.0 gCO₂e/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:

For questions 1, 6, and 7, SoCalGas will need an extension to respond by January 9, 2026. We have been diligently working on gathering responsive data, but the holidays have interfered with our efforts with relevant people out on vacation.

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QUESTION 2:

Provide any agreements West Biofuels (“WBF”) has made with SoCalGas regarding the vehicles that will be used in the production of Bio-SNG/Bio-CNG and the transport of Bio- CNG between the WBF and SoCalGas facilities, pursuant to OP 38 of D.22-02-025.

RESPONSE 2:

SoCalGas and WBF have not entered into any agreements regarding the vehicles to be used for producing BioSNG or -BioCNG. The requirements outlined in OP 38 of -D.22-02025 apply only if SoCalGas procures the -BioSNG. At this time, WBF has not determined the end use for the biomethane.

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QUESTION 3:

Provide any agreements WBF has made with SoCalGas regarding the combustion and non-combustion generation of electricity at the WBF facility pursuant to OP 39 and 40 of D.22- 02-025.

RESPONSE 3:

WBF does not intend to operate an onsite power generation facility; therefore, no agreements between SoCalGas and WBF exist regarding electricity generation.

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QUESTION 4:

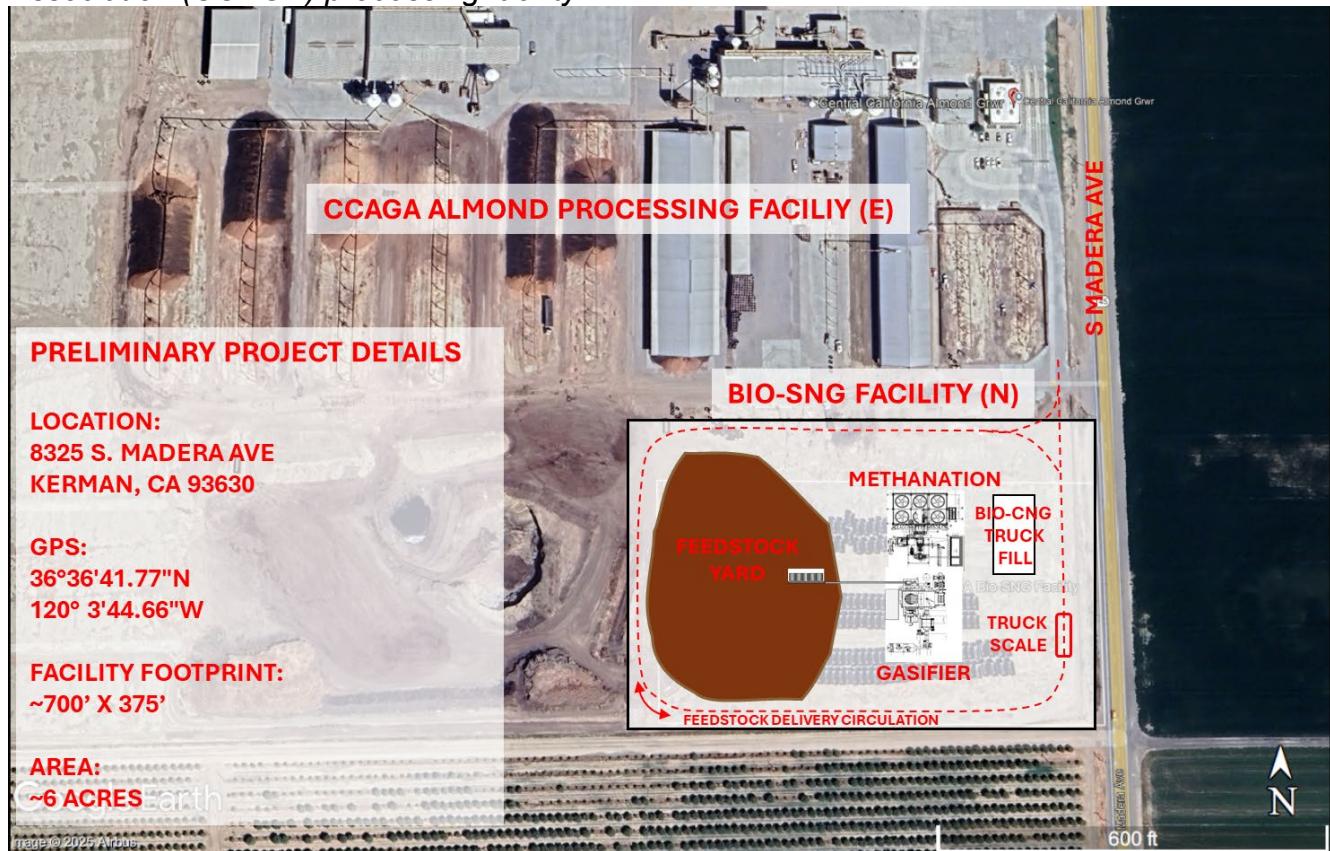
Provide facility maps and available engineering designs of the proposed WBF woody biomass pilot project location and the proposed SoCalGas interconnection point.

RESPONSE 4:

WBF Facility

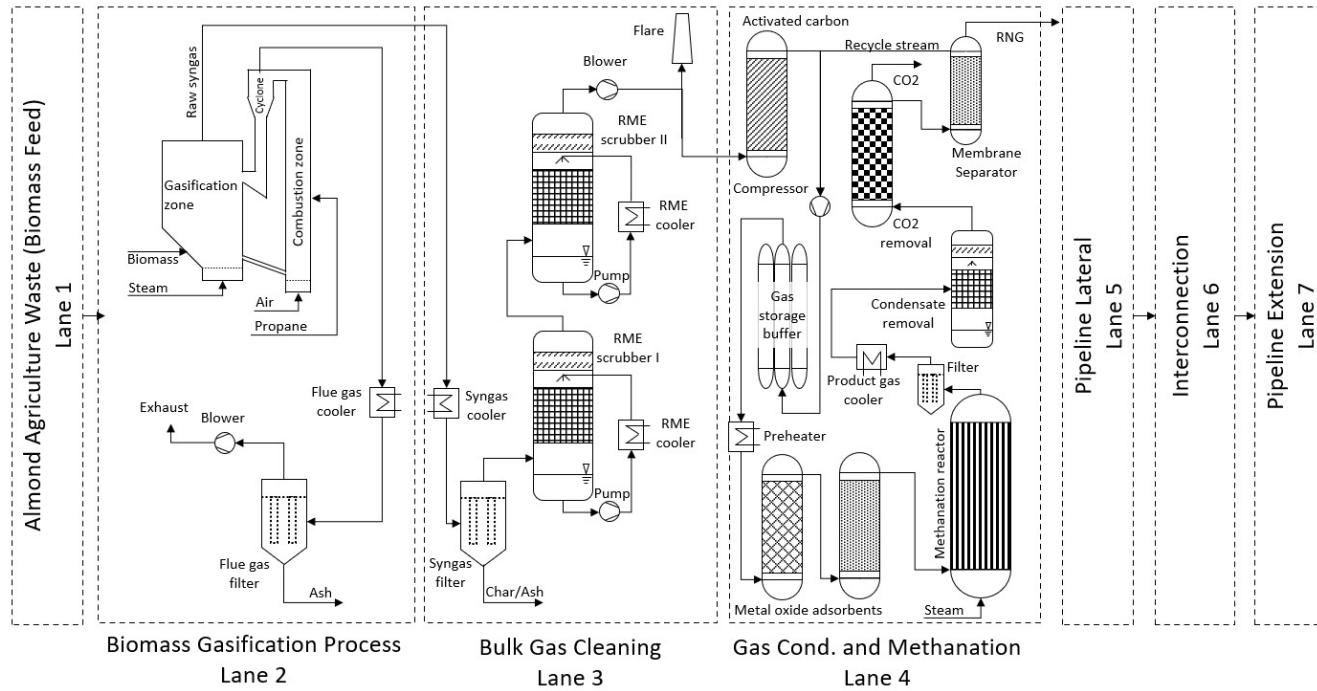
No design work has been completed to date. Below provides high-level site map and process flow diagram.

Proposed WBF site location located adjacent to Central California Almond Growers Association (CCAGA) processing facility



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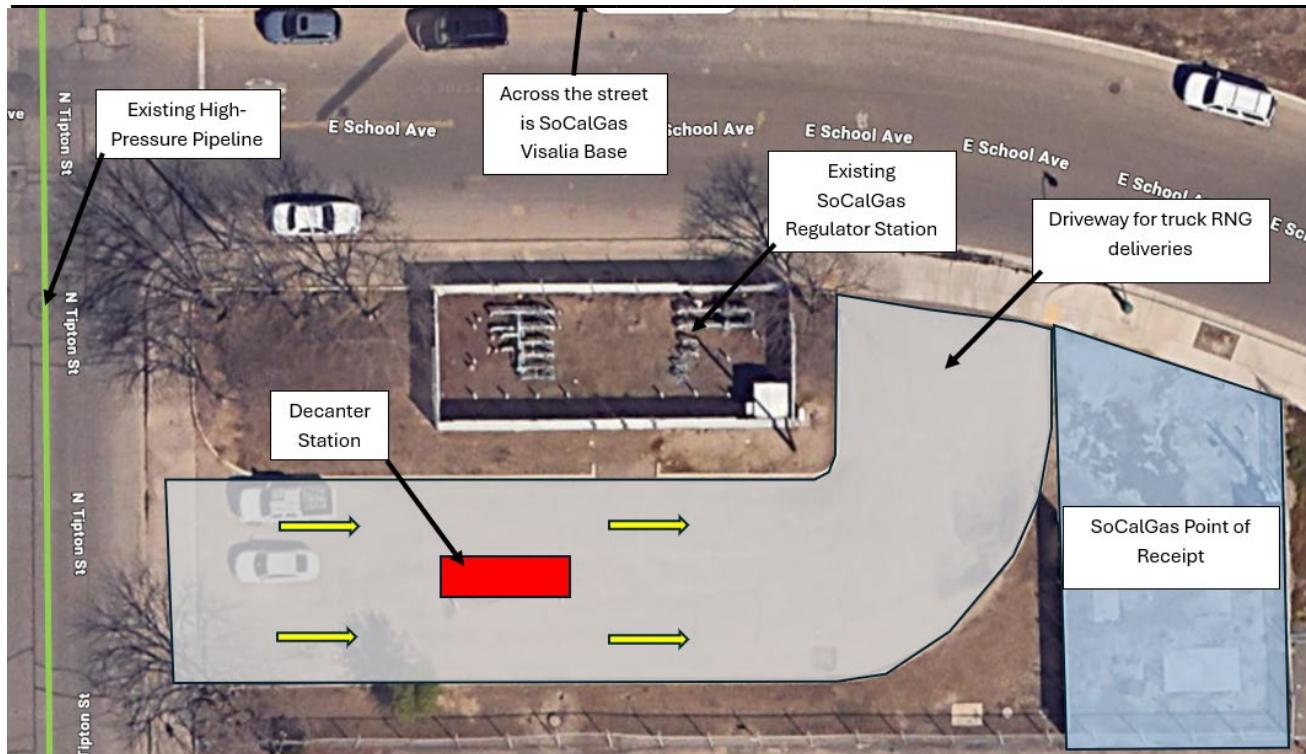
WBF Process Flow Diagram



SoCalGas Interconnection

No design work has been completed to date. Below provides high-level site map for the interconnection facility at the Visalia parcel.

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QUESTION 5:

Did SoCalGas and WBF evaluate the feasibility of establishing the facility at a location at which direct interconnection with SoCalGas's pipelines were feasible? If so, provide all communications and analysis that discuss SoCalGas's and WBF's evaluation.

RESPONSE 5:

SoCalGas conducted an SB 1440 Screening Study to identify the nearest pipeline with sufficient capacity for the projected Bio-SNG volume. The RNG takeaway capacity analysis indicates that the nearest pipeline with adequate capacity is approximately 18 miles away, making it an economically unfeasible option. Below is the information provided to WBF, along with the screening study analysis completed by SoCalGas. Please see attached, Communications provided to WBF and SoCalGas's takeaway capacity analysis

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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:

For questions 1, 6, and 7, SoCalGas will need an extension to respond by January 9, 2026. We have been diligently working on gathering responsive data, but the holidays have interfered with our efforts with relevant people out on vacation.

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QUESTION 7:

Provide a breakdown in Excel format of the estimated costs associated with the construction, operation, and maintenance of the pilot's Applicant-Owned Infrastructure (lanes 1 through 6) by lane, including estimations of engineering costs, equipment and materials, construction, labor, and/or any other applicable cost categories.

RESPONSE 7:

For questions 1, 6, and 7, SoCalGas will need an extension to respond by January 9, 2026. We have been diligently working on gathering responsive data, but the holidays have interfered with our efforts with relevant people out on vacation.

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QUESTION 8:

Describe the funding mechanisms anticipated to be used to cover any WBF and SoCalGas project costs that exceed the \$19.704 million in Cap-and-Trade allowance proceeds allocated for this project.

- a. SoCalGas testimony at JL-19 states "There is no anticipated revenue requirement that is being proposed for recovery from ratepayers associated with the Utility-Owned Pipeline Infrastructure presented herein." Does SoCalGas anticipate that ratepayer funding will be needed to support any of the costs associated with the construction of applicant-owned infrastructure related to this project? i. If so, what is the anticipated impact on rates that would result from these costs?
- b. How does SoCalGas plan to contend with any potential cost-overages for the construction of applicant- or utility-owned infrastructure related to this project?

RESPONSE 8

Other than the \$19.704 million in cap-and-trade funding, SoCalGas does not plan to utilize any ratepayer funding for the utility-owned and applicant-owned infrastructure.

- a) No
- b) Not applicable

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QUESTION 9:

Did SoCalGas consider and/or quantify the potential wildfire prevention benefits associated with the diversion of biomass waste due to this pilot project?

- a. If so, provide the analysis used to quantify those benefits in Excel format with active cells and formulas.

RESPONSE 9:

- a) SoCalGas did not assess or quantify potential wildfire prevention benefits because no bids were received from projects proposing the use of forest woody biomass. However, WBF's technology is capable of utilizing forest woody biomass, making this demonstration relevant for that feedstock in future projects.

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QUESTION 10:

Describe how the proposed pilot project, which would convert up to approximately 29,200 bone trydons (BDT) per year of agricultural waste into biomethane, aligns with SoCalGas's short-term target of procuring sufficient to divert approximately four million tons of organic waste from landfill by 2025, per D.22-02-025?

- a. What parameters did SoCalGas consider in the sizing of this project?
- b. How do the diversion rates and costs associated with this project compare to those of SoCalGas's other biomass diversion projects?

RESPONSE 10:

The woody biomass feedstock identified for the proposed pilot project does not meet the eligibility requirements under SB 1440's short-term target, as the material is not currently directed to landfill disposal.

- a) The solicitation issued by SoCalGas for the selection of at least one woody biomass pilot project did not specify any sizing requirements.
- b) As stated above, none of the woody biomass is currently directed for landfill disposal, so there is nothing to divert from landfills.

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QUESTION 11:

Explain how SoCalGas chose the proposed project's location of the gasification facility in Kerman, California and the new interconnection facility on a company-owned parcel in Visalia, California. Include in your explanation:

- a. Other potential locations considered and selection criteria and scoring, if applicable; and
- b. Communications between SoCalGas and the Department of Conservation, Natural Resources Agency, and Commission's Energy Division regarding the strategic placement of the pilot project. If SoCalGas is unable to provide the communications, provide a summary of the communications.

RESPONSE 11:

a)

WBF Gasification Facility - SoCalGas issued a Solicitation and WBF was the sole respondent whose proposal met the requirements under D.22-02-025 and D.24-12-032, to build, own, and operate a gasification facility which has a proposed location of Kerman, California.

SoCalGas Interconnection Facility - SoCalGas selected the Visalia site based on the following factors: (1) the parcel is owned by SoCalGas; (2) proximity to an existing SoCalGas operating base, facilitating monitoring of the interconnection facility; (3) prior use of the location as a compressed natural gas (CNG) refueling station with existing driveways; and (4) adjacent to a high-pressure pipeline with sufficient RNG takeaway capacity, thereby minimizing pipeline extension costs. SoCalGas also evaluated a parcel it owns in the City of Dinuba; however, the site does not offer the advantages identified in items (2) and (3) above

- b) Because WBF was the sole respondent to SoCalGas's solicitation and proposed a gasification-to-biomethane facility in Kerman, located near the available woody biomass feedstock, SoCalGas's engagement with the Department of Conservation (DOC) and the Commission's Energy Division was limited to providing information rather than conducting strategic siting discussions for the proposed pilot project.