

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

DATA REQUEST Cal PA-SCG-DR06

Date Requested: December 30, 2025, Submitted: January 14, 2026

QUESTION 1:

Page 11 and 12 of the Application of Southern California Gas Company (U 904 G) for Authorization to Implement Revenue Requirement for Costs to Enable Commencement of Phase 2 Activities for Angeles Link states, "As an additional measure to promote the affordability of the costs of Phase 2 activities, and in light of the widespread ratepayer and public interest benefits that could be realized by advancing the study of and ultimately implementing Angeles Link, SoCalGas proposes to allocate the costs of Phase 2 activities across all ratepayers utilizing the equal cents per therm (ECPT) cost allocation methodology, which has been previously authorized by the Commission for activities for the public good. Doing so results in a reduction of burden on any one class of customer and recognizes the benefits to existing ratepayers across SoCalGas's service territory by advancing to Phase 2 and the ultimate realization of Angeles Link. The illustrative rate impact on the average residential customer bill of 37 therms/month, taking into account accrued interest savings, is an average increase of approximately \$0.35 per monthly bill over three years, or approximately \$12.60 in total. All ratepayers will benefit directly from this work and each has an interest in a feasible and affordable means of decarbonization that supports the reliability of the energy system."

With respect to the statement above, please clarify,

- a. How the following was calculated: "an average increase of approximately \$0.35 per monthly bill over three years, or approximately \$12.60 in total"
- b. Where ratepayers would see this on their bill. Would it be included in the Public Purpose Surcharge? Or to another category?
- c. How "all ratepayers will benefit directly from this work"?
- d. What the bill impact would look like if cost allocation was only deemed prudent for a subset of ratepayers, such as non-core customers?

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RESPONSE 1:

- 1a. This amount is calculated by averaging the projected bill increases for 2026, 2027, and 2028 (\$0.34, \$0.35, and \$0.25, respectively). The annual impact is based on multiplying the \$0.35 monthly increase by 12 months for each of the three years. In other words, $(0.35 \times 12) \times 3$. See Prepared Direct Testimony of Nasim Ahmed and Michael W. Foster (Chapter 7 – Regulatory Accounting, Cost Recovery, Revenue Requirement, and Rates) for additional information.
- 1b. SoCalGas has proposed that the increase only impact transportation rates, not to be included as part of Public Purpose Program Surcharge (PPPS). See Prepared Direct Testimony of Nasim Ahmed and Michael W. Foster (Chapter 7 – Regulatory Accounting, Cost Recovery, Revenue Requirement, and Rates) for additional information.
- 1c. SoCalGas has proposed a transformative proposal which can be a cornerstone in California’s transition to a sustainable and resilient energy future.¹ As described in prepared direct testimony, Angeles Link could deliver a multitude of benefits—recognized by the Commission as being in the public interest—not only to direct users of the clean renewable hydrogen flowing through Angeles Link but to all SoCalGas ratepayers, by contributing to energy reliability and resiliency, decarbonization, and improved air quality and public health. See Prepared Direct Testimony of Maryam Brown (Chapter 1 – Policy), Neil Navin (Chapter 2 – Angeles Link and Summary of Phase 1 Studies), Josh Schellenberg (Chapter 5 – Value of Electric Grid Reliability and Resilience), and Dr. Sonja Sax (Chapter 6 – Air Quality and Public Health Benefits) for additional information.
- 1d. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it is overly broad and unduly burdensome and the burden, expense and intrusiveness of this request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the reference to “a subset of ratepayers, such as non-core customers,” and presents an incomplete hypothetical.

¹ Angeles Link Phase 2 Application at 91 available at https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_SoCalGasApplicationALP2_PDF_A_2024.12.20.pdf.

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QUESTION 2:

On Page 28 of Reply Brief of Southern California Gas Company (U 904 G) on Phase 2A issues of Law and Policy, SoCalGas references ARCHES H2 Year in Review: Letter from Leadership. That letter includes the following statements:

“We will work together with all partners to implement projects based on commercial viability as well as environmental and community impact.”

“This transition accelerates ARCHES’ evolution to a market enabler fully focusing on what we believe California truly needs: a comprehensive market integration that connects hydrogen supply with demand, brokers commercial relationships, provides price transparency, and enables the transactions that build a sustainable hydrogen economy. ”

“ARCHES will focus on facilitating marketplace transactions that lead to more and faster Final Investment Decisions (FID) and generate actual revenue for partners.”

“Partners can expect ARCHES to provide services including demand aggregation, contract facilitation, technical validation, workforce development, and supply chain coordination; all focused on project and partner commercial success.”

Has SoCalGas received any information from ARCHES, the Governor’s Office of Business and Economic Development (GO-Biz), or the University of California regarding:

- a. Implementation timeline or prioritization of Angeles Link?
- b. The “commercial viability” of Angeles Link?
- c. The “environmental and community impact” of Angeles Link?
- d. The role of Angeles Link in “ARCHES’ evolution”?
- e. Opportunities for faster FID for Angeles Link?
- f. Any of the above-described services for Angeles Link?

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RESPONSE 2:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues scoped in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

As of the date referenced in the question (Reply Brief filed October 17), SoCalGas has not received any non-public information from ARCHES, the Governor's Office of Business and Economic Development (GO-Biz), or the University of California regarding the implementation timeline, commercial viability, environmental and community impact, opportunities for faster FID, the role of Angeles Link in ARCHES evolution, nor any of the above described services in question 1 for Angeles Link.

SoCalGas did receive the following written communication in December 2025 in which ARCHES indicated that SoCalGas's response to the ARCHES Request for Information (RFI) for Hydrogen-Dedicated Open-Access Pipelines had been reviewed but that, given the U.S. Department of Energy (DOE) terminated funding for the ARCHES program on October 1, 2025, ARCHES is currently taking a strategic pause while appeal and lawsuits ensue.

Please refer to attachment: ALP2_A2412011_DR_CalPA_06_Q02_Attach_ARCHES email 12-17-2025 for further details.

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QUESTION 3:

On Page 35 of Reply Brief of Southern California Gas Company (U 904 G) on Phase 2A issues of Law and Policy, SoCalGas describes the “benefits of Angeles Link—decarbonization, improved air quality and public health, and increased energy system reliability and resiliency.”

Please clarify how Angeles Link provides:

- a. Decarbonization
- b. Improved air quality
- c. Improved public health
- d. Increased energy system reliability
- e. Increased energy system resiliency

RESPONSE 3:

As stated in Response 1c, Angeles Link could deliver a multitude of benefits—recognized by the Commission as being in the public interest—not only to direct users of the clean renewable hydrogen flowing through Angeles Link but to all SoCalGas ratepayers, by contributing to energy reliability and resiliency, decarbonization, and improved air quality and public health. For further details on the benefits of Angeles Link, please refer to the following prepared direct testimony for further details:

- Prepared Direct Testimony of Maryam Brown (Chapter 1 – Policy) as it describes the benefits that could be provided by Angeles Link to SoCalGas ratepayers and the communities SoCalGas serves, including making California’s clean energy transition more affordable.²
- SoCalGas conducted over a dozen feasibility studies which explored the Phase 1 Decision’s required topics such as cost-effectiveness, technical feasibility, and public interest benefits. Prepared Direct Testimony of Neil Navin (Chapter 2 - Angeles Link and Summary of Phase 1 Studies) presents the results of these Phase 1 studies and associated benefits. For an overview of what the Phase 1 Studies convey about Angeles Link, including key findings developed that will guide future considerations, activities, and ‘benefits of Angeles Link’, please refer to Attachment A - Angeles Link Phase 1 Consolidated Report.³

² Angeles Link Direct Testimony of Maryam Brown, Section II available at https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_TestimonyCh.1-Policy_M.Brown_PDFA.pdf.

³ Angeles Link Direct Testimony of Neil Navin, Section III-C and Appendix X available at https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_TestimonyCh.2-AngelesLinkandSummaryofPhase1Studies_N.Navin_PDFA.pdf.

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- Prepared Direct Testimony of Josh Schellenberg (Chapter 5 - Value of Electric Grid Reliability and Resilience) describes the anticipated increases in electric needs associated with electrification, the value of electric grid reliability and resiliency as the State decarbonizes, and the needs for clean firm power to enhance energy system reliability and resiliency. This testimony also describes the anticipated costs of electric outages in SoCalGas's service territory in the absence of electric reliability, as well as the network effects of clean renewable hydrogen investments.⁴
 - Prepared Direct Testimony of Dr. Sonja Sax (Chapter 6 - Air Quality and Public Health Benefits) presents testimony on the public health benefits associated with the improved air quality benefits Angeles Link could provide and estimates the related potential monetized health benefits.⁵

⁴ Angeles Link Phase 2 Direct Testimony of Josh Schellenberg available at https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_TestimonyCh.5-ValueofElecGridReliabilityandResilience_Schellenberg_PDFa.pdf.

⁵ Angeles Link Phase 2 Direct Testimony of Dr. Sonja Sax at SS-2, SS-18 to SS-19 available at https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_TestimonyCh.6-AirQualityandPublicHealthBenefits_Dr.Sax_PDFa.pdf.

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QUESTION 4:

On Page 40 of Reply Brief of Southern California Gas Company (U 904 G) on Phase 2A issues of Law and Policy, SoCalGas States “Given the decarbonization, air quality, grid reliability, workforce, and economic benefits that Angeles Link could provide in addition to delivery of clean renewable hydrogen to end users, it is in SoCalGas’s ratepayers’ interests – both existing and future ratepayers – for SoCalGas to develop Angeles Link and present it as a defined project for the Commission to consider in the future for a CPCN.”

Please clarify the following:

- a. By stating “in addition to delivery of clean renewable hydrogen to end users”, does SoCalGas mean that Angeles Link provides “decarbonization, air quality, grid reliability, workforce, and economic benefits” in itself without also delivering clean renewable hydrogen? If so, how would that be achieved?
- b. What “future ratepayers” does SoCalGas envision benefiting from Angeles Link? What is the anticipated timeline for these “future ratepayers” requesting service from Angeles Link?
- c. When does SoCalGas anticipate presenting Angeles Link as a defined project for a CPCN?

RESPONSE 4:

- 4a. No; that sentence is intended to convey that Angeles Link can provide the benefit of delivering clean renewable hydrogen to end users while supporting/providing decarbonization, air quality, grid reliability, workforce, and economic benefits.
- 4b. SoCalGas proposes to further study this issue in Phase 2. As discussed in the Demand Study, future potential ratepayers may or may not currently be served by SoCalGas.⁶ In addition to existing SoCalGas customers who may use clean renewable hydrogen in the future such as power generation and industrial facilities, examples of future potential clean renewable hydrogen customers who are not currently served by SoCalGas may include non-utility served heavy-duty vehicle operators, commercial harbor craft operators, ocean-going vessel operators, and locomotive operators.

The Angeles Link Phase 1 studies were limited to identification of certain, but not all potential end uses that may drive potential demand for clean renewable hydrogen. Continued analysis in future phases of Angeles Link will further identify and refine potential customers, anticipated timelines for service requests, and beneficiaries of Angeles Link.

⁶ Angeles Link Demand Study, Section 1.2 at 18 available at: <https://www.socalgas.com/sites/default/files/alproject/Angeles-Link-Phase-1-Final-Demand-Study.pdf>.

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- 4c. Contingent on approval of Angeles Link Phase 2, Phase 2 activities for Angeles Link alone are expected to take approximately 30 months to complete.⁷ Upon completion of Phase 2 activities, SoCalGas may apply to the CPUC for a Certificate of Public Convenience and Necessity (CPCN) and obtain other necessary permits for Angeles Link's construction and operation.⁸

⁷ SoCalGas Angeles Link Phase 2, Application at 12 available at https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_SoCalGasApplicationALP2_PDF_A_2024.12.20.pdf.

⁸ SoCalGas Angeles Link Phase 2, Direct Testimony of Neil Navin (Angeles Link and Summary of Phase 1 Studies) at NN-28 available at https://www.socalgas.com/sites/default/files/alproject/phase2/A.24-12-XXX_TestimonyCh.2-AngelesLinkandSummaryofPhase1Studies_N.Navin_PDF_A.pdf.