

**SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)**  
**Cal Advocates-SCG-A2510008-002**  
**Woody Biomass Pilot Project application (A.25-10-008)**  
**DATE REQUESTED: February 11, 2026**  
**RESPONSE DUE: February 26, 2026**

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**QUESTION 1:**

Has SoCalGas been in discussion with WBF regarding the cost of procurement of biosynthetic natural gas (“Bio-SNG”) from the proposed Woody Biomass Project? If so, what are the expected or contracted costs of biomethane produced from the Woody Biomass Project in \$/MMbtu?

**RESPONSE 1:**

No.

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**QUESTION 2:**

D.22-02-025 Ordering Paragraph (OP) 1 and OP 2 at p. 57 required that SoCalGas “host a workshop on cost-effectiveness within 45 days of the effective date of this decision” and “include results of the workshop and address feedback received at the workshop in Tier 2 Advice Letters establishing a Standard Biomethane Procurement Methodology.” SoCalGas submitted the Joint Tier 2 Advice Letter (AL) 6003-G on July 5, 2022, in response to this requirement.

**QUESTION 2a:**

Provide the confidential version of AL 6003-G.

**RESPONSE 2a:**

SoCalGas objects to this request as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence because SoCalGas has not entered into a procurement agreement with West Biofuels nor is it a requirement under D.22-02-025 pursuant to D.24-01-060.

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**QUESTION 2b:**

Did SoCalGas follow their Standard Biomethane Procurement Methodology (SBPM) when developing the Woody Biomass Project?

- i. If so, would Bio-SNG procurement from the Woody Biomass Project meet the standards set in SoCalGas's SBPM?
- ii. If not, explain why.

**RESPONSE 2b:**

No, because SoCalGas does not have a procurement agreement with West Biofuels and is no longer mandated to procure biomethane from this project pursuant to D.24-01-060.

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**QUESTION 2c:**

If SoCalGas did follow their SBPM when developing the Woody Biomass Project, provide the following information related to the SBPM conditions described in AL 6003-G.

- i. The calculated Break-Even Price for renewable natural gas (“RNG”), including the components of the All-In Cost of RNG and of the All-In Cost of Conventional Natural Gas described in Appendix A of AL 6003-G at 4 and 5.
- ii. The scored Monetary Costs of the project, calculated as the contract price, or procurement costs, divided by the Break-Even Price.
- iii. A description of and monetized value assigned to each of the Other Environmental & Non-Monetary Factors associated with the project, including those listed in Appendix A of AL 6003-G at 5.
- iv. The weights assigned to the Monetary Costs score and Non-Monetary Factor score used to determine the SBPM Project Score as described in Appendix A of AL 6003-G at 5 and 6.

**RESPONSE 2c:**

Not applicable because SoCalGas does not have a procurement agreement with West Biofuels and is no longer mandated to procure biomethane from this project pursuant to D.24-01-060.

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**QUESTION 3:**

D.22-02-025 OP 43 at p. 68 requires that biomethane gasification pilot projects “study and report fugitive methane, pollutant, and particulate matter emissions and emissions reduction or elimination methods in the gasification or pyrolysis process, the methanation process, and pipeline infrastructure.”

In the Prepared Direct Revised Testimony of James Lucas and Dr. Matthew D. Summers, SoCalGas states that “SoCalGas and WBF meet this criterion by committing to thorough emissions documentation and reporting for the SB 1440 Pilot Project” (p. JLMS-11) and that “SoCalGas will work with the Commission and/or other state agencies to develop a reporting template for the SB 1440 Pilot Project” (p. JLMS-20).

**QUESTION 3a:**

Describe any methods SoCalGas and WBF have established or considered to document, study, and report fugitive methane, pollutant, and particulate matter emissions in the gasification or pyrolysis process, the methanation process, and pipeline infrastructure associated with the Woody Biomass Project.

**RESPONSE 3a:**

SoCalGas and WBF have not established or considered methods to document, study and report emissions. As provided in SoCalGas’s Reply Comments Section II(A)(3) at pages 4 and 5.<sup>1</sup>, “Section IV of the Application’s Chapter 2 testimony (titled “Program Reporting”) nonetheless provides a roadmap for studying and monitoring emissions.<sup>2</sup> This includes SoCalGas working “with the Commission and/or other state agencies to develop a reporting template for the SB 1440 Pilot Project.”<sup>3</sup> This approach is similar to that undertaken in the SB 1383 Dairy Biomethane Pilot Projects. The Commission and its constituent agencies are leading the data reporting process in such projects.<sup>4</sup> The Application thus contemplates monitoring, studying, and reporting emissions by proposing to utilize the existing processes used by these pilot projects, pending determination by the Commission and its constituent agencies.”

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<sup>1</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M588/K915/588915254.PDF>

<sup>2</sup> SoCalGas Chapter 2 (Lucas/Summers) at JLMS-20.

<sup>3</sup> *Id.*

<sup>4</sup> D.17.12-004, Attachment B at 4.

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**QUESTION 3b:**

Provide any analyses SoCalGas and/or WBF have conducted regarding the feasibility and/or effectiveness of fugitive emission monitoring technologies or methodologies for the Woody Biomass Project.

**RESPONSE 3b:**

SoCalGas and/or WBF have not conducted this type of specific analysis for the SB 1440 Woody Biomass Pilot Project. The response to Question 4 provides the procedures planned to be used by SoCalGas and WBF to address fugitive methane emissions.

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**QUESTION 4:**

D.22-02-025 OP 49, p. 70-71 states, “in the procurement contract, the utilities shall establish a procedure for immediate methane leak remediation at the production facility or along that gas pipeline interconnection as the preferred response, and specify required actions if there is no immediate remediation, such as timeline for repair, a graduated fee schedule to promote timely repair, or payment reductions, etc.” Provide the procedures for methane leak detection and remediation that SoCalGas and WBF have established for the production facility and associated operations (Lane 3 through Lane 6) and the pipeline point of receipt, interconnection, and pipeline extension (Lane 7 through Lane 9).

**RESPONSE 4:**

SoCalGas objects to the request on the grounds that SoCalGas does not have a procurement contract with West Biofuels and is no longer mandated to procure biomethane from this project pursuant to D.24-01-060.

Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

SoCalGas and WBF plan to utilize the following for methane leak detection and remediation.

**The following apply to the Lanes 3 to 6 (to be performed by WBF)**

- **Methane Leak Detection:** WBF employs regular scheduled inspections using advanced methane detection technologies, such as handheld detectors, optical gas imaging cameras, and continuous monitoring systems within confined areas and buildings. Inspections are conducted at key points, including production equipment, pipeline connections, and transfer points.
- **Immediate Remediation Procedure:** Upon detection of a methane leak, field personnel are required to assess the severity and, where safe and practical, initiate immediate repairs to stop the leak. If immediate remediation is not possible due to operational or safety constraints, the incident is escalated for urgent scheduling of repairs.
- **Timelines and Escalation:** For leaks that cannot be immediately repaired, WBF will follow a defined escalation process. This includes documenting the leak, notifying responsible parties, and setting a timeline for repair based on the leak’s size and potential impact. All leaks are tracked until resolution.
- **Verification and Reporting:** All leak detection and remediation activities are documented and reported as required by regulatory authorities. Verification of repair completion is performed before resuming normal operations at the affected site.

**The following apply to Lanes 7-9 (to be performed by SoCalGas)**

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Leakage detection would be conducted in accordance with SoCalGas's most current gas standard for leakage survey. Frequency of monitoring will be based on location, material type, and operating pressure

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**QUESTION 5:**

In reference to “A.25-10-008-01\_Cal\_Advocates-SCG-01\_Response\_to\_Q1.pdf,” methane leakage emission factors are not clearly delineated in the GREET model presented.1 Provide information about the “methane leak standard,” methane leakage assumptions, or methane leakage emission factors included in the GREET life cycle emission modeling. Provide the leakage information for each Lane of the project and individual processes or equipment as applicable.

**RESPONSE 5 (WBF)**

The WBF Bio-SNG production infrastructure (Lanes 2-5) are not permitted to operate with leakage for safety reasons. The WBF Facility uses gas-tight reactor vessels, valves, and compressors and methane impervious stainless-steel piping that are not expected to have any leakage during normal operations. Therefore, no continuous leakage assumption was used in the GREET modeling.

As stated in Response to Question 4, the SoCalGas interconnection facility (Lanes 7-9) will adhere to SoCalGas’s current gas standard for leakage survey and assumes no continuous leakage as this could be identified and addressed during the leakage survey process.

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**QUESTION 6:**

In reference to “Cal Advocates-SCG-A2510008-01\_Response\_to\_Q1\_and\_Q6.pdf”, and the accompanying “Lanes 7-8-9 Cost Breakdown Draft.xlsx,” the estimated sum cost of lanes 7, 8, and 9 would be \$9.966 million.

**QUESTION 6a:**

Confirm that SoCalGas’s estimate of \$9.966 million of the authorized \$19.704 million in Cap-and-Trade funds is allocated to utility-owned infrastructure.

**RESPONSE 6a:**

Yes.

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**QUESTION 6b:**

Has SoCalGas communicated with West Biofuels regarding the availability of potential funding for project infrastructure that would be owned by West Biofuels? If so, provide any and all such communications.

**RESPONSE 6b:**

The availability of potential funding for project infrastructure was communicated to all parties who received the SB 1440 Woody Biomass Pilot Project solicitation. The availability of potential funding was also included in Lucas/Summers Revised Testimony at JLMS-18. There was also some verbal communications with West Biofuels.

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**QUESTION 6c:**

Provide the historical data used from comparable Renewable Natural Gas Point-Of-Receipt facility projects, in designing your cost estimates. Include the details of your response in an Excel Spreadsheet.

**RESPONSE 6c:**

The most recently completed RNG project with comparable scope served as the historical benchmark for developing the Lane 8 and 9 Class 5 estimates. This project was selected as it reflects the most up-to-date design practices and provides the closest cost equivalency for benchmarking. The corresponding benchmark scope components are presented below:

| <b>Historical Benchmark - Pipeline vs POR</b> |                     |                         |                    |
|---|---------------------|-------------------------|--------------------|
|   |                     |                         | <b>EAC</b>         |
| <b>Estimate at Completion<br/>(EAC)</b>       | <b>\$10,050,000</b> | <b>Pipeline</b>         | <b>\$5,130,000</b> |
|   |                     | <b>Point of Receipt</b> | <b>\$4,920,000</b> |

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**QUESTION 6d:**

Provide the correlated historical data with each cost function, per line item.

**RESPONSE 6d:**

Below is the historical data for the tracked cost functions from the Simi Valley project the historical benchmark project of comparable scope. Each cost function includes both the pipeline and POR costs. The totals below are 2025 dollars with no applied escalation.

| <b>Historical Benchmark - Cost Analysis</b> |                     |
|---|---------------------|
| <b>Cost Function</b>                        | <b>Total</b>        |
| <b>Company Labor</b>                        | <b>\$580,000</b>    |
| <b>Engineering Contractor</b>               | <b>\$740,000</b>    |
| <b>Material</b>                             | <b>\$1,650,000</b>  |
| <b>Construction Contractor</b>              | <b>\$3,920,000</b>  |
| <b>Construction Management</b>              | <b>\$880,000</b>    |
| <b>Other Purchased Services</b>             | <b>\$730,000</b>    |
| <b>Total Direct Cost</b>                    | <b>\$8,500,000</b>  |
| <b>Total Non-Direct Cost</b>                | <b>\$1,550,000</b>  |
| <b>Combined Total Cost</b>                  | <b>\$10,050,000</b> |

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**QUESTION 6e:**

How many full-time employees (FTEs) and/or contract staff are included in your cost estimates?

**RESPONSE 6e:**

The total FTEs are calculated based on a 36-month schedule for project initiation through closeout.

| Cost Function | Total HRS | Total FTEs |
|---------------|-----------|------------|
| Total FTE     | 3971.00   | 2.40       |

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**QUESTION 6f:**

Provide the respective cost function and specific department where each FTE and/or contract staff is employed.

**RESPONSE 6f:**

FTEs are calculated based on a 36-month schedule for project initiation through closeout.

| Cost Function                | Total HRS | Total FTE | Resources  |
|------------------------------|-----------|-----------|--|
| Project Management           | 3971      | 0.66      | Portfolio Manager, Project Manager, Project Engineer, Project Coordinator  |
| Engineering and Design       | 1896      | 0.31      | Engineering Team Lead, Pipeline Engineer, Station Engineer, Civil Engineer, Pipeline Integrity Coordinator, Survey Manager, Survey Technician, Pipeline Integrity Team Lead  |
| Material - Permanent         | 0         | 0         | No labor assumed   |
| Material - Consumable & Temp | 0         | 0         | No labor assumed   |
| Fabrication                  | 0         | 0         | No labor assumed   |
| Construction                 | 2920      | 0.48      | Chief Inspector, Welding Inspector, Utility Inspector, Field Construction Lead, Construction Team Lead, Field Engineer, Construction Manager, Safety Inspector   |
| Commissioning                | 160       | 0.03      | District Union Labor Manager   |
| Operations                   | 2334      | 0.39      | District Union Manager, District Union Labor Manager, Construction Team Lead, Field Engineer, Safety Inspector, District Union Labor   |
| Project Support Services     | 1386      | 0.23      | Estimator, Permit Lead, Permit Coordinator, Public Affairs Manager, Material Coordinator, Supply Management Lead, Scheduler, Cost Controller, Outreach Specialist  |
| Environmental                | 1096      | 0.18      | Environmental Manager, Environmental Team Lead, Environmental Project Manager, Environmental Project Assistant, Certified Industrial Hygienist, Asbestos Consultant, Abatement Superintendent, Abatement Laborer, Abatement Warehouseman, Abatement Admin, Abatement Truck |
| Land & Right of Way          | 748       | 0.12      | Administrative Assistant, Land Manager, Land Specialist, Project Manager   |
| Land                         | 0         | 0         | Land purchase cost only, none assumed  |
| -Permitting                  | 0         | 0         | Permit cost only (Labor included in project services)  |
| Project Overhead             | 0         | 0         | Indirect Costs   |

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**QUESTION 6g:**

Provide the number of labor hours associated with each FTE and/or contract staff.

**RESPONSE 6g:**

Refer to response 6f.

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**QUESTION 6h:**

Provide the budgetary vendor quotes used in your cost estimates.

**RESPONSE 6h:**

The attached documents contain Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, D.21-09-020.”

While the estimates for Lanes 8 and 9 were developed using historical data, the estimate for Lane 7 was developed with a vendor high-level budgetary quote.

The estimate for Lane 7, Decanter and Offloading system, was developed with the use of a vendor quote.

Please see attachment DR-02 Q6h Lane 7 Vendor Quote\_CONFIDENTIAL.

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**QUESTION 6i:**

i. Provide the specific line-item costs associated with:

- i. The approximate number of feet of pipeline needed for installation.
- ii. Construction materials.
- iii. Meter Assembly (MSA).
- iv. SCADA Panel.
- v. Equipment Shelter.

**RESPONSE 6i:**

| Line Item  | Cost*    | Notes   |
|--|----------|---|
| i. The approximate number of feet pipeline needed for installation | \$700k   | Total installed cost of approximately 200 Linear Feet of Pipe from Point of Receipt to Tie-In of existing pipeline.   |
| ii. Construction Materials   |          | Construction materials are procured by contractors during construction.   |
| iii, iv and v. Point of Receipt Equipment                          | \$1.361M |   |
| Electrical Shelter   | \$227k   | The Meter Set Assembly (MSA), SCADA panel, and Equipment Shelter are integrated components of the Point of Receipt (POR) and are essential to supporting its operation. The specialty material costs are provided in response to questions iii, iv and v. |
| Total Flow Computer  | \$12k    |   |
| Analyzer shelter   | \$262k   |   |
| Analyzer Fittings  | \$23k    |   |
| O2 Analyzer  | \$21k    |   |
| Gas Chromatograph  | \$29k    |   |
| YZ odorant skid  | \$257k   |   |
| Filter Separator   | \$106k   |   |
| RTU Panel  | \$81k    |   |
| Magnetic Level Gauge   | \$41k    |   |
| Orifice Plate  | \$42k    |   |
| Control Valves & Cabinet   | \$155k   |   |

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|                      |       |
|----------------------|-------|
| Sampling Bottle      | \$7k  |
| Gas Analyzer         | \$75k |
| Sample Probe         | \$2k  |
| Pressure Transmitter | \$21k |

\* The material line-item costs are presented with escalation.

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**QUESTION 7:**

In reference to SoCalGas's General Rate Case (GRC) A.22-05-015, et al., as found in Decision (D). 24-12-074, Table 10.3, Line A at 187. Provide the specific workpapers presented in its GRC as it relates to new construction pipeline capital improvement expenditures. In the response include pipeline sizing, length, and system use, including the differentials of SoCalGas's zero-based forecast and Class 5 estimate.

**RESPONSE 7:**

Below is the link to SoCalGas' GRC workpapers in relation to new construction pipeline capital improvement expenditures.

**[SCG-06-CWP-R Rick Chiapa and Aaron Bell and Steve Hruby-Gas Transmission Operations and Construction 49453.pdf](#)**

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**QUESTION 8:**

In reference to “Cal Advocates-SCG-A2510008-01\_Response\_to\_2-5\_8-11.pdf,” SoCalGas states that “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.”

**QUESTION 8a:**

How does SoCalGas plan to fund ongoing maintenance and operations associated with the new utility-owned pipelines and/or associated infrastructure?

**RESPONSE 8a:**

SoCalGas is not proposing to fund ongoing maintenance and operations for Lanes 7-9. Within A.25-10-008, under Attachment A Renewable Gas Interconnection Agreement, Section 9(a) titled “O&M FEES: INVOICING AND PAYMENT TERMS”, it states that “Utility shall collect operation and maintenance fees associated with the operation and maintenance of the Utility Facilities necessary to accept Renewable Gas from Interconnector in accordance with Utility’s Gas Rules, tariffs, schedules, and ordinary business practices.”

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**QUESTION 8b:**

Does SoCalGas plan to fund ongoing maintenance and operations associated with pipelines and/or associated infrastructure owned by West Biofuels?

**RESPONSE 8b:**

SoCalGas does not plan to fund the ongoing maintenance and operation of assets owned by WBF, as referenced in Attachment B (Page 6, Chapter 3, Section a-iv) of the Application.

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**QUESTION 9:**

Regarding SoCalGas and West Biofuels historical business relationship:

**QUESTION 9a:**

Has SoCalGas contracted with West Biofuels for biomethane projects prior to the solicitation made in compliance with D.22-02-025? If so, provide a list of the projects, including for each:

- The project name and location;
- The date the contract was signed;
- If the contract is still active; and,
- A brief description of the products and/or services provided.

**RESPONSE 9a:**

SoCalGas has participated in one project with WBF in which SoCalGas contracted with the Alliance for Sustainable Energy, LLC, a manager and operator of the National Renewable Energy Laboratory (NREL) to fund an RD&D project performed by WBF.

- Project Name: West Biofuels Renewable Gas Separation System and Techno-Economic Assessment
- Location: Woodland, CA
- Contract Execution Date: December 10, 2019
- Contract Status: Not active
- Project Description: WBF was to conduct research demonstrating production and gas-separation technologies capable of converting forest biomass residuals into pipeline-quality renewable gas and value added byproducts.

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**QUESTION 9b:**

Has West Biofuels contacted SoCalGas in response to previous solicitations or on its own initiative? If so, provide a list of project proposals, including for each:

- The project name;
- The date SoCalGas received the proposal; and,
- A brief description of the proposed products and/or services to be provided.

**RESPONSE 9b:**

Other than the project referenced in the Response to Question 9a, neither SoCalGas nor WBF recalls any instance in which WBF contacted SoCalGas.

SoCalGas also notes that, in responding to this question, it provided this question to the current business unit personnel most likely to have information relevant to this response. SoCalGas's response relies on the memories of individuals and therefore may not capture the information requested in this question.

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**QUESTION 10:**

In reference to “Cal Advocates-SCG-A2510008-01\_Response\_to\_Q1\_and\_Q6.pdf” and Cal Advocates-SCG-A2510008-01\_Response\_to\_Q7.pdf,” roughly \$9.966 million might be contributed to fund Lanes 7, 8, and 9. And the estimated cost of infrastructure that will be owned by West Biofuels is \$34.97 million. Aside from owners or shareholders of West Biofuels, are there any other third-party sources of financing contributing to the applicant-owned costs of the proposed Woody Biomass Project such as grants, awards, independent investors, etc.? If so, provide a list of each funding source, including organizational and/or individual names, the business relationship arrangement, and total estimated funding amounts to be contributed.

**RESPONSE 10:**

Currently, only West Biofuels owners and shareholders are confirmed as funding sources for this project. West Biofuels may pursue debt financing for the project, pending the CPUC's decision on the application.

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**QUESTION 11:**

In reference to “Cal Advocates-SCG-A2510008-01\_Response\_to\_2-5\_8-11.pdf,” SoCalGas states, “SoCalGas and WBF have not entered into any agreements regarding the vehicles to be used for producing BioSNG or -BioCNG.” However, the direct Revised testimony of James Lucas and Dr. Matthew D. Summers at lines 18-23, p. JLMS-8 states, “the Bio-SNG produced will be transported by compressed natural gas-powered trucks (using renewable natural gas) to SoCalGas’s interconnection in Visalia, CA.”

**QUESTION 11a:**

Confirm if compressed natural gas-powered trucks using RNG will be used to transport the biomethane produced at the WBF facility to SoCalGas’s operating base in the City of Visalia for injection and transport to SoCalGas’s pipelines.

**RESPONSE 11a:**

Yes.

**SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)**  
**Cal Advocates-SCG-A2510008-002**  
**Woody Biomass Pilot Project application (A.25-10-008)**  
**DATE REQUESTED: February 11, 2026**  
**RESPONSE DUE: February 26, 2026**

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**QUESTION 11b:**

If compressed natural gas-powered trucks using RNG will not be used to transport the biomethane produced at the WBF facility to SoCalGas's operating base in the City of Visalia, describe in detail, the methodology SoCalGas will utilize to transport and quality measure the syngas produced by the WBF facility.

**RESPONSE 11b:**

Not applicable.