

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR ANGELES LINK PHASE 1
REASONABLENESS REVIEW (DATA REQUEST Cal PA-SCG-13)**

**Date Requested: March 26, 2026, Submitted: April 9, 2026
Supplement May 1, 2026**

QUESTION 1: SoCalGas' "Angeles Link Phase 1 Pipeline Sizing & Design Criteria Final Report" discusses the proposed Angeles Link's pipeline impact radius (PIR):

Potential Impact Radius – As discussed in the Safety Study, the potential impact radius (PIR) is utilized to determine high and moderate consequence areas along a pipeline that will inform the development of an integrity management program, as required by 49 CFR Part 192 Subpart O - Gas Transmission Pipeline Integrity Management. The PIR will be calculated in future project phases after a preferred route is selected and the pipeline nominal diameter and MAOP are finalized. Refer to "Integrity Management" section in Chapter 8 of the Safety Study for additional information on PIR and consequence areas.¹

Is SoCalGas aware of any internal standards, state regulations, federal regulations, or industry best practices which define a minimum separation distance between two or more hydrogen or natural gas pipelines to ensure that the catastrophic failure or rupture of one pipeline does not lead to the failure of other pipelines? If yes, please indicate and provide those standards.

FN 1 - Angeles Link Phase 1 Pipeline Sizing & Design Criteria Final Report (Pipeline Sizing Final Report), at 79.

RESPONSE 1:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that parties may obtain discovery "that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence." This request seeks information outside the scope of this Angeles Link Phase 1 Reasonableness Review proceeding.

SUPPLEMENTAL RESPONSE 1:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that parties may obtain discovery "that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence." This request seeks information outside the scope of this Angeles Link Phase 1 Reasonableness Review proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

The evaluation of minimum separation distances between hydrogen pipelines was not within the scope of the Angeles Link Phase 1 feasibility studies. As noted in the Pipeline Sizing Final Report, the potential impact radius (PIR) for the proposed Angeles Link pipeline was expected to be calculated in future project phases after a preferred route was selected and the pipeline nominal diameter and maximum allowable operating pressure (MAOP) were finalized. However, the decision in Application (A.) 24-12-011 denied authorization of Phase 2 of Angeles Link, and as such, no further evaluation of PIR or minimum separation distances is presently anticipated.

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With respect to natural gas pipelines, SoCalGas notes that during the meet and confer held on April 23, 2026, Cal Advocates clarified that this question pertains to natural gas transmission pipelines. While minimum separation distances between natural gas transmission pipelines were not a subject addressed in the Phase 1 studies, SoCalGas notes it is aware of the following:

- SoCalGas Gas Standard 223.0002 which specifies minimum horizontal & vertical separations. See attachment: ALP1-RR_A2506011_DR_CalPA_13_Q01_Attach_01
- 49 CFR §192.325 which addresses clearance between a pipeline and other underground structures to facilitate inspection, maintenance, and corrosion control. Available at: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-D/part-192#192.325>
- Industry Standard Codes that are incorporated by reference in 49 CFR §192, which are established by national standard bodies such as API, ANSI, and ASME, to address clearance between a pipeline and other underground structures.

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QUESTION 2: SoCalGas' "Angeles Link Phase 1 Preliminary Routing/Configuration Analysis Final Report" attempts to propose initial route corridors for consideration, where corridors are defined as:

Corridors – A linear geographic pathway where existing utilities are already installed or have the potential to be installed in the future. In the context of this report, corridors are pathways that may contain existing or future rights-of-way (see definition below) that have been identified for preliminary evaluation and the potential installation of hydrogen gas transmission lines.²

SoCalGas' "Angeles Link Phase 1 Pipeline Sizing & Design Criteria Final Report" assesses the hydraulic feasibility of both Single-run and Mixed-run configurations along the proposed routes.³ This report also highlights the intersection with routing against existing infrastructure within these proposed corridors:

Infrastructure Proximity – Additional infrastructure within close proximity to the pipeline may have design implications. It is necessary to consider multiple components when siting an underground hydrogen pipeline with regard to other substructures, such as content carried, pressure, diameter, size, setback, and depth requirements, etc.⁴

- a. Has SoCalGas assessed the minimum distances that its Mixed-run configurations of two Angeles Link pipelines would need to be set apart from each other in order to meet the various requirements provided in response to Question 1? If not, in which Phase does SoCalGas intend to perform such analysis?
- b. Has SoCalGas assessed the minimum distances that its Single-run and Mixed-run configurations of Angeles Link pipelines would need to be set apart from pipelines or other infrastructure already existing within the proposed corridor in order to meet the various requirements provided in response to Question 1? If not, in which Phase does SoCalGas intend to perform such analysis?
- c. Has SoCalGas assessed whether its proposed corridor is large enough to be able to support the Single-run or Mixed-run configurations of Angeles Link pipelines alongside any existing pipelines or other infrastructure within the proposed corridor and still meet the minimum distance requirements provided in response to Question 1? If not, in which Phase does SoCalGas intend to perform such analysis?

FN 2 - Angeles Link Phase 1 Preliminary Routing/Configuration Analysis Final Report (Routing Final Report), at 76.

FN 3 - Pipeline Sizing Final Report, at 28-50.

FN 4 - Pipeline Sizing Final Report, at 78.

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RESPONSE 2:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that parties may obtain discovery "that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence." This request seeks information outside the scope of this Angeles Link Phase 1 Reasonableness Review proceeding.

SUPPLEMENTAL RESPONSE 2:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that parties may obtain discovery "that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence." This request seeks information outside the scope of this Angeles Link Phase 1 Reasonableness Review proceeding. Subject to and without waving the foregoing objection, SoCalGas responds as follows.

- a. See Response 1. This analysis was not within the scope of the Angeles Link Phase 1 feasibility studies. This assessment was expected to be performed during Phase 2, when more detailed engineering and route refinement would have taken place. However, the decision in Application (A.) 24-12-011 denied authorization of Phase 2 of Angeles Link, and as such, no further evaluation is presently anticipated.
- b. See Response 1. This analysis was not within the scope of the Angeles Link Phase 1 feasibility studies. This assessment was expected to be performed during Phase 2, when more detailed engineering and route refinement would have taken place. However, the decision in Application (A.) 24-12-011 denied authorization of Phase 2 of Angeles Link, and as such, no further evaluation is presently anticipated.
- c. See Response 1. This analysis was not within the scope of the Angeles Link Phase 1 feasibility studies. This assessment was expected to be performed during Phase 2, when more detailed engineering and route refinement would have taken place. However, the decision in Application (A.) 24-12-011 denied authorization of Phase 2 of Angeles Link, and as such, no further evaluation is presently anticipated.