

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1ST SET OF DATA REQUEST FROM AIR PRODUCTS & CHEMICALS, INC.)

Date Received: June 17, 2022; Date Responded: July 1, 2022

QUESTION 1:

All documents and communications relating to the Angeles Link Project, including but not limited to all initial studies and plans pertaining to the Project, all communications with potential supplier(s) and/or potential end users(s) for the Project, all communications with any official and/or his or her staff, agent, and/or representative, all data and calculations underlying Your estimates of production capacity and emissions benefits of the Project, and any studies or estimates You have prepared regarding the potential cost of delivering hydrogen via the pipeline system You plan to construct as part of the Angeles Link Project.

RESPONSE 1:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to this request to the extent it seeks documents and information protected by the attorney-client privilege and/or attorney work product doctrine, and also on the basis the request seeks protected confidential information including trade secrets and other market-sensitive and/or proprietary information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Regarding "initial studies and plans pertaining to the Project," SoCalGas will be releasing information related to pre-feasibility and Phase 1 activities shortly, which will be made publicly available.

Regarding "communications with any official and/or his or her staff, agent, and/or representative," please see Response 16 to data request Sierra Club-01.

Regarding "data and calculations underlying Your estimates of production capacity and emissions benefits of the Project," please see Response 13 to this data request as well as the initial studies and plans to be provided.

Regarding "studies or estimates You have prepared regarding the potential cost of delivering hydrogen via the pipeline system You plan to construct as part of the Angeles Link Project," please see workpapers provided in Response 2 to data request PAO-01.

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QUESTION 2:

All discovery and/or data requests served on You by other parties to this proceeding and Your responses thereto.

RESPONSE 2:

All public discovery responses in this proceeding are available on SoCalGas's website at www.socalgas.com/regulatory/angeleslink. Attachments to those responses not available on the website are being provided concurrently with this response.

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QUESTION 3:

- (a) Please list all potential end users for the Project that you have identified to date.
- (b) For each potential end user that You have communicated with, please provide any projections for firm capacity of hydrogen needed and the estimated timeline for the projected demand.

RESPONSE 3:

- a) SoCalGas objects to the request as vague and ambiguous with respect to the term “potential end users.” SoCalGas also objects to the request as overly broad, particularly to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner’s Scoping Memo and Ruling. SoCalGas further objects to the request to the extent it seeks protected confidential market sensitive and/or trade secret information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Given the phrasing in Questions 3(b) and 5, SoCalGas interprets the term “potential end users” to mean entities or individuals that have expressed a desire to enter into a contractual commitment to receive service from Angeles Link and have therefore begun discussing delivery specifications. Given that definition, SoCalGas has not identified any potential end users at this time. However, as noted in the Application, SoCalGas expects target customer segments for Angeles Link to be heavy-duty transportation, “hard-to-electrify” industries, and electric generation. See, e.g., Application at 2. Additionally, as noted in the Application at p. 23, Phase 1 of the Project is anticipated to include a “(r)efined assessment of expected green hydrogen demand and identification of initial and subsequent end users in the Los Angeles Basin, including the anticipated timing for any necessary facility conversions to allow for the use of hydrogen as a fuel source.”

- b) SoCalGas objects to the request to the extent it seeks protected confidential, customer-specific information. SoCalGas also objects to the request to the extent it seeks information that is outside the scope of this proceeding as set forth in the Assigned Commissioner’s Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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SoCalGas has not discussed projections of hydrogen firm capacity needs with any potential end users, as that term is defined in Response 3(a).

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QUESTION 4:

(a) Identify all potential suppliers of hydrogen for the Project with which You have communicated about the Project.

(b) For each potential supplier identified in (a), provide details of the supplier's:

- i. projected production methods;
- ii. anticipated source(s) of resources (such as renewable power and/or water);
- iii. anticipated location of production;
- iv. projected cost of production;
- v. anticipated date by which production could begin;
- vi. projected capacity (including any estimated capacity changes over time); and
- vii. estimated lifecycle production emissions and support, therefore.

RESPONSE 4:

- a) SoCalGas objects to the request as vague and ambiguous with respect to the term "potential suppliers." SoCalGas also objects to the request to extent it seeks information outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to the request to the extent it seeks protected confidential market sensitive and/or trade secret information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Given the phrasing in Questions 4(b) and 5, SoCalGas interprets the term "potential suppliers" to mean hydrogen producers who have expressed a desire to enter into a contractual commitment to provide service to Angeles Link and have therefore begun discussing delivery specifications. Given that definition, SoCalGas has not identified any potential suppliers at this time. As noted in the Application at p. 23, Phase 1 of the Project is anticipated to include a "(r)efined assessment of potential sources of green hydrogen production to meet the identified demand." As further clarified in the Application at p. 25, "SoCalGas does not propose developing hydrogen production facilities as part of the scope of the Project."

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- b) SoCalGas objects to the request to the extent it seeks protected confidential, customer-specific information. SoCalGas also objects to this request to the extent it seeks information outside the scope of this proceeding as determined in the Assigned Commissioner’s Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas has not discussed green hydrogen production specifications with any potential suppliers, as that term is defined in Response 4(a). SoCalGas nonetheless provides responses herein to certain of the sub-questions asked for by this request.

With respect to the request for “projected production methods,” as noted in the Application at pg. 1, SoCalGas is developing the Project in order to deliver third-party produced renewable green hydrogen into the Los Angeles Basin and, as further defined in the Application at p. 2, “green hydrogen” generally refers to hydrogen produced through electrolysis using renewable energy.

With respect to the request for “anticipated location of production,” on pg. 22 of the Application, SoCalGas provided an initial estimate that green hydrogen generation locations could include, but are not limited to, the Central Valley, Mojave Desert/Needles, or Blythe areas.

With respect to the request for “anticipated date by which production could begin,” SoCalGas has not yet reached a conclusion as to the dates by which hydrogen production would begin, and anticipates considering timing issues further as part of Phases 1-3. As discussed in the Application, SoCalGas does not propose to develop hydrogen production facilities for Angeles Link, and plans to collaborate with hydrogen producers during Phases 1-3.

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QUESTION 5:

Provide any and all contracts, memoranda of understanding, or agreements related to the Project that You have entered with any potential supplier or end user of the Project.

RESPONSE 5:

SoCalGas objects to the request as vague and ambiguous with respect to the terms “potential end users” and “potential suppliers.” SoCalGas also objects to this request to the extent it seeks information outside the scope of this proceeding as determined by the Assigned Commissioner’s Scoping Memo and Ruling. SoCalGas further objects to the request to the extent it seeks protected confidential customer-specific, market sensitive and/or trade secret information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Using the definitions of “potential end users” and “potential suppliers” defined in Responses 3(a) and 4(a), respectively, SoCalGas has not yet entered any contracts, memoranda of understanding, or agreements related to the Project with any potential supplier or end user of the Project.

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QUESTION 6:

Identify any and all of the benefits You contend that the requested memorandum account will provide to Your existing ratepayers. Please be specific regarding to which group of existing ratepayers each identified benefit would accrue.

RESPONSE 6:

SoCalGas objects to the request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, particularly with respect to its request to identify "any and all" benefits to groups of existing ratepayers. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please see SoCalGas's opening brief in the instant proceeding filed on June 29, 2022, at pp. 30-37.

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QUESTION 7:

- (a) Identify all potential end users of the Project that are existing SoCalGas ratepayers.
- (b) For each current ratepayer identified in (a), provide the company name and location(s) of its facilities that are potential end users of the Project.

RESPONSE 7:

- a) SoCalGas objects to this request on the ground that it is vague and ambiguous, particularly with respect to the term “potential end users.” SoCalGas further objects to this request to the extent it seeks information outside the scope of this proceeding as determined in the Assigned Commissioner’s Scoping Memo and Ruling. SoCalGas further objects to the request to the extent it seeks protected confidential market sensitive and/or trade secret information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 3. Generally, the heavy-duty transportation, “hard-to-electrify” industries, and electric generation customer segments all comprise existing SoCalGas ratepayers. However, the heavy-duty transportation segment would also include customers currently utilizing diesel fuel, which would not comprise a current SoCalGas customer subsegment.

- b) SoCalGas objects to this request to the extent it seeks information that is not within the scope of this proceeding as determined in the Assigned Commissioner’s Scoping Memo and Ruling. SoCalGas objects to this request to the extent it seeks protected confidential customer specific information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

As noted in Response 3, SoCalGas has not identified any specific potential end users, as that term is defined.

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QUESTION 8:

(a) Is each of the following LADWP Generating Stations a current ratepayer of SoCalGas?

- i. Harbor Generating Station
- ii. Haynes Generating Station
- iii. Scattergood Generating Station
- iv. Valley Generating Station

(b) For each of the above Generating Stations that is a current ratepayer of SoCalGas, please identify the specific service(s) provided to each in 2019, 2020, 2021, and January-May 2022.

(c) For each of the above Generating Stations that is a current ratepayer of SoCalGas, please identify the tariff under which SoCalGas provides natural gas, transportation, storage, and/or other service(s) to the Generating Station or to LADWP as a whole.

(d) For each of the above Generating Stations that is a current ratepayer of SoCalGas, please provide copies of any and all of Your operative contracts with LADWP and/or the Generating Station for the supply, delivery, transportation, and/or storage service(s) provided by SoCalGas to the Generating Station.

(e) Please provide any filings SoCalGas has made to the CPUC since January 2019 concerning or including information regarding service it has provided to LADWP.

(f) Please provide any filings SoCalGas has made to FERC since January 2019 concerning or including information regarding service it has provided to LADWP.

(g) Please provide a copy of any analysis You have done to calculate potential lost natural gas revenue to SoCalGas as a result of converting any or all of the above Generating Stations to alternative fuels.

(h) If any of the LADWP Generating Stations identified in (a) is not a current ratepayer of SoCalGas, please confirm whether You have any contractual relationship any such Generating Station, and if so, provide any and all operative agreements with LADWP and/or the Generating Station.

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RESPONSE 8:

- a) SoCalGas objects to this request on the grounds it seeks protected confidential, customer specific information. SoCalGas further objects to the request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner’s Scoping Memo and Ruling.
- b) SoCalGas objects to this request on the grounds it seeks protected confidential, customer specific information. SoCalGas further objects to the request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner’s Scoping Memo and Ruling.
- c) SoCalGas objects to the request on the grounds it seeks protected confidential, customer specific information. SoCalGas also objects to the request as vague and ambiguous, and overly broad, with respect to the phrase “and/or other service(s).” SoCalGas further objects to this request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner’s Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

End use service to electric generators is provided by SoCalGas pursuant to either Schedule No. GT-TLS (here: <https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/GT-TLS.pdf>) or Schedule No. GT-NC (here: <https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/GT-NC.pdf>). Backbone Transportation Service is available to all customers under Schedule No. G-BTS (here: <https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/G-BTS.pdf>). Balancing services available to all customers are described in Rule No. 30 (here: <https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/30.pdf>). With respect to unbundled storage services, as noted in Schedule G-TBS (here: <https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/G-TBS.pdf>) “(t)his tariff is closed to new subscription until further notice except for contracts with Southwest Gas Corporation and the City of Long Beach to meet Commission authorized wholesale core storage requirements.”

- d) SoCalGas objects to the extent the request seeks confidential, customer specific information. SoCalGas further objects to the extent the request does not cover material in scope for this proceeding and therefore is not relevant nor likely to lead to admissible evidence.

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- e) SoCalGas objects to this request on the basis it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks information that is publicly available, and thus is equally available to the requestor. SoCalGas also objects to the request as vague and ambiguous with respect to the phrase "concerning or including information regarding service." SoCalGas further objects to this request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas has not made any filings to the CPUC since January 2019 that specifically address LADWP.

- f) SoCalGas objects to this request to the extent the request seeks protected confidential, customer specific information. SoCalGas also objects to the request as vague and ambiguous with respect to the phrase "concerning or including information regarding service." SoCalGas further objects to this request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas operates pursuant to a Hinshaw Exemption, and is therefore not directly regulated by the FERC. Therefore, SoCalGas has made no filings at the FERC since January 2019 concerning or including information regarding service it has provided to any customers, including LADWP.

- g) SoCalGas objects to this request to the extent it seeks protected confidential, customer specific information. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas has not calculated potential lost natural gas revenue as a result of converting any or all of the above Generating Stations to alternative fuels.

- h) SoCalGas objects to this request to the extent it seeks protected confidential, customer specific information.

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QUESTION 9:

- (a) Identify any and all of the benefits You contend that the requested memorandum account will provide to Your future ratepayers.
- (b) Please be specific regarding to which group of future ratepayers each identified benefit would accrue.
- (c) Identify any future ratepayers that are not also current ratepayers.

RESPONSE 9:

- a) SoCalGas objects to the request as overly broad, vague, and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, particularly with respect to its request to identify "any and all" benefits to future ratepayers. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please see SoCalGas's opening brief in the instant proceeding filed on June 29, 2022, at pp. 30-37.

- b) Please see Response 9(a).
- c) SoCalGas objects to the request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure with respect to its request to identify "any" future ratepayers. SoCalGas further objects to this request to the extent it calls for speculation. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Please see Response 7(a).

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QUESTION 10:

Provide any and all submission(s) You made to LADWP in response to its Request for Information for Green Hydrogen Pathways for Supporting 100% Renewable Energy (RFI Number: 8.5.21-Power-SAL).

RESPONSE 10:

SoCalGas objects to this request on the ground it seeks information that is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to this request to the extent it seeks protected confidential information including trade secrets and other market-sensitive and/or proprietary information.

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QUESTION 11:

- (a) Identify and provide a copy of each application or request You have filed in the last ten (10) years seeking authorization for a memorandum account with the CPUC.
- (b) For each such request or application identified in (a), confirm whether You have obtained authorization for the requested memorandum account, and provide copies of the decisions issued by the CPUC for each request or application.
- (c) For each memorandum account You have been authorized to open in the last ten (10) years, confirm whether You were allowed to recover some, or all of the costs tracked in the memorandum account from your ratepayers, and provide the percentages of total costs tracked that You were permitted to recover

RESPONSE 11:

- a) SoCalGas objects to this request as unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, including because it seeks information that is publicly available and thus is equally available to the requestor. SoCalGas further objects to the request to the extent it seeks information outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling.
- b) SoCalGas objects to this request as unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, including because it seeks information that is publicly available and thus is equally available to the requestor. SoCalGas further objects to this request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling.
- c) SoCalGas objects to the request as unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, including because it seeks information that is publicly available and thus is equally available to the requestor. SoCalGas further objects to this request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling.

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QUESTION 12:

Provide any and all recording(s) and/or transcript(s) of Your Angles Link webinars on May 19, 2022 and May 31, 2022.

RESPONSE 12:

SoCalGas objects to this request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The Angeles Link webinars held on May 19, 2022 and May 31, 2022 were not recorded. The "Microsoft Teams Live" platform utilized by SoCalGas automatically created an unofficial closed-captioned transcript of the webinars, both of which are attached. SoCalGas has made no attempt to review those transcriptions for errors and therefore cannot confirm their accuracy.

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QUESTION 13:

Provide all data, calculations, and/or studies on which the figures on pages 8 and 9 of the Angeles Link webinar presentation (available at <https://www.socalgas.com/sites/default/files/2022-05/Informational%20Webinar%205.19.pdf>) are based.

RESPONSE 13:

SoCalGas objects to this request to the extent it seeks information that is outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please see the Excel file "Attachment PAO-01 Q20."

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QUESTION 14:

Will the pipeline system You plan to construct as part of the Angeles Link Project be exclusively intrastate pipeline(s)? If not, please describe the interstate pipeline(s) that You anticipate constructing as part of the Project, the anticipated location of any such pipelines, and the purpose of any such pipelines.

RESPONSE 14:

The scope and the extent of the proposed hydrogen transport system will be evaluated in Phases 1-3, and will include an evaluation of exclusively intrastate pipelines. Please see Application at 22, FN 61. (“An intrastate hydrogen energy transport system is subject to the jurisdiction of this Commission, see Section II.B. SoCalGas is aware of efforts by LADWP, the Intermountain Power Agency and others to transition the Intermountain Power Plant in Delta, Utah, from coal generation to hydrogen, with associated underground hydrogen storage. To the extent the results of the Phase 1 and Phase 2 analysis suggest assets located outside California are required to serve California customers, SoCalGas would seek recovery only for costs that are fairly apportioned to California customers.”)

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QUESTION 15:

Is the pipeline system You plan to construct as part of the Angeles Link Project intended to connect to any other intrastate or interstate pipeline(s)? If so, please explain how You anticipate that the pipeline system You plan to construct as part of the Angeles Link Project will connect to other such pipelines, and the purpose of such connection(s).

RESPONSE 15:

SoCalGas objects to this request to the extent it seeks information outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to this request to the extent the request calls for speculation. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The scope and the extent of the proposed hydrogen transport system will be evaluated in Phases 1-3. SoCalGas anticipates that, ultimately, Angeles Link will be one part of a larger hydrogen economy, and as such would likely connect with both intrastate and interstate green hydrogen pipelines. Interstate pipelines would provide Angeles Link access to out-of-state green hydrogen production and storage, while other intrastate pipelines would provide additional customer load centers access to Angeles Link. Nonetheless, no decisions have been made regarding future infrastructure needs and opportunities beyond Angeles Link.

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QUESTION 16:

Is the Project related to any of Your plans or initiatives to blend hydrogen into Your natural gas transmission system? If so, please explain how the Project relates to Your plans or initiatives to blend hydrogen into Your natural gas transmission system.

RESPONSE 16:

No. Please see Application at 36-37 (emphasis added):

“The Commission and the CEC are also presently engaged in hydrogen injection or blending initiatives in which SoCalGas has participated, including the University of California, Riverside’s Hydrogen Blending Impacts Study, and programs under the CEC’s Natural Gas Research and Development Program. The Project would be distinct from these initiatives. Unlike those initiatives, which examine the effects of hydrogen blends on end uses or the blending of hydrogen in existing natural gas pipelines, the goal of this Project is a 100% green hydrogen transport system targeted toward hard-to-electrify sectors seeking green hydrogen, and would be unrelated to any efforts involving blending hydrogen into the existing natural gas transmission and distribution system. For the same reasons, the Project is also distinct from the work described in SoCalGas’s 2020 application to the Commission for a hydrogen blending demonstration project memorandum account. No hydrogen blending research costs would be recorded in this Memo Account.”

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QUESTION 17:

Please provide any and all draft and final map(s) of the proposed route(s) for the pipeline system You plan to construct as part of the Angeles Link Project.

RESPONSE 17:

SoCalGas objects to the request as vague and ambiguous, including with respect to the term “proposed route(s).” SoCalGas further objects to the extent the request seeks protected confidential critical infrastructure information. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas interprets the term “proposed route(s)” to mean routes chosen for advancement to a Certificate of Public Necessity and Convenience (CPCN) proceeding. Given that definition, as described in the Application, the proposed route for Angeles Link is not intended to be chosen until Phase 2 and will be presented to the CPUC for approval as part of a CPCN application at the conclusion of Phase 3. Therefore, SoCalGas has not mapped a proposed route(s) for Angeles Link. Please see also Response 1 regarding initial studies and plans pertaining to the Project.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1ST SET OF DATA REQUEST FROM AIR PRODUCTS & CHEMICALS, INC.)

Date Received: June 17, 2022; Date Responded: July 1, 2022

QUESTION 18:

Confirm whether You intend to repurpose any extant pipelines or other facilities for the Project. If so, please identify each such pipeline and/or facility.

RESPONSE 18:

SoCalGas objects to this request on the ground it seeks information that is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

At this time, we generally anticipate Angeles Link to comprise of new infrastructure. Assessment and design of the proposed system will occur in Phases 1 through 3, including any opportunities to repurpose any extant pipelines or other facilities. We will also explore the possibility of repurposing existing rights-of-way for new hydrogen infrastructure build-out.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1ST SET OF DATA REQUEST FROM AIR PRODUCTS & CHEMICALS, INC.)

Date Received: June 17, 2022; Date Responded: July 1, 2022

QUESTION 19:

Please provide copies of the most recent Commission orders granting, renewing, and/or modifying each of your existing Certificates of Public Convenience and Necessity.

RESPONSE 19:

SoCalGas objects to the request as unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, including because the information is publicly available and thus is equally available to the requestor. SoCalGas further objects to this request to the extent it seeks information outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling.

**SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT**

(A.22-02-007)

(1ST SET OF DATA REQUEST FROM AIR PRODUCTS & CHEMICALS, INC.)

Date Received: June 17, 2022; Date Responded: July 1, 2022

QUESTION 20:

All documents and communications relating to SB 733, including, but not limited to, any drafts of the bill language and any communications with any official and/or his or her staff, agent, or representative relating to SB 733 or any prior drafts of the language currently therein.

RESPONSE 20:

SoCalGas objects to the request as overbroad and unduly burdensome with respect to the request to furnish "(a)ll documents and communications relating to SB 733." SoCalGas also objects to this request to the extent it seeks information outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to this request to the extent it seeks information protected by the attorney-client privilege and/or attorney work product doctrine. Finally, SoCalGas objects to the request as unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, including because to the extent that it seeks information that is publicly available and thus is equally available to the requestor.