

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

(A.22-02-007)

(DATA REQUEST SIERRA CLUB-SOCALGAS-01)

Date Received: April 20, 2022; Date Responded: May 4, 2022

QUESTION 1:

Please provide copies of all discovery requests SoCalGas issued in this proceeding. Please continue to provide any such documents on a regular basis until this proceeding is closed.

RESPONSE 1:

SoCalGas objects to this request to the extent the question seeks continuing responses. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas has not issued any discovery requests in this proceeding as of the date of tendering this data request response. All public discovery responses in this proceeding will be available on SoCalGas's public website at www.socalgas.com/regulatory/angeleslink.

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QUESTION 2:

Please provide copies of all SoCalGas' responses to data requests and any other discovery requests from other parties in this proceeding. Please continue to provide any such documents on a regular basis until this proceeding is closed.

RESPONSE 2:

SoCalGas objects to this request to the extent the question seeks continuing responses. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas has responded to one data request from another party in this proceeding as of the date of tendering this data request response, which is attached. All public discovery responses in this proceeding will be available on SoCalGas's public website at www.socalgas.com/regulatory/angeleslink.

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QUESTION 3:

Please refer to SoCalGas' Application in this proceeding at page 5, footnote 6. Please provide the workpapers for this report. Please also identify all the report's underlying assumptions and the sources of those assumptions.

RESPONSE 3:

SoCalGas objects to this request on the ground it seeks information that is not relevant to this proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Assumptions supporting the referenced report are included on page 24 of the report, entitled "References & Information Regarding Forward-Looking Statements" available at https://www.socalgas.com/sites/default/files/2021-03/SoCalGas_Climate_Commitment.pdf.

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QUESTION 4:

Please refer to SoCalGas' Application in this proceeding at page 5, footnote 7. Please provide the workpapers for this report. Please also identify all the report's underlying assumptions and the sources of those assumptions.

RESPONSE 4:

SoCalGas objects to this request on the ground it seeks information that is not relevant to this proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Assumptions supporting the referenced report were included in the report's technical appendix, available at <https://www.socalgas.com/sites/default/files/2021-11/Technical-Appendix.pdf>.

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QUESTION 5:

Please refer to SoCalGas' Application in this proceeding at page 22. When SoCalGas states that the Project's transmission pipeline(s) would connect to "individual customer and/or a distribution system," please clarify whether the Project pipelines could connect to a distribution system that delivers a blend of hydrogen and methane gas.

RESPONSE 5:

SoCalGas objects to this request on the ground it calls for speculation. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

The intent of the Angeles Link Project is to establish a dedicated system of trunk transmission pipelines that would transport green hydrogen from production sources to customers, either directly and/or potentially via a broader dedicated hydrogen distribution system.

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QUESTION 6:

Please refer to SoCalGas' Application in this proceeding at page 22. Once SoCalGas selects its "preferred pipeline system," does it intend to seek the Commission's approval for that selection before proceeding to Phase 2? If not, at what point does SoCalGas envision the Commission determining whether SoCalGas selected a reasonable preferred pipeline system from the options considered (and not considered) in Phase 1?

RESPONSE 6:

The memorandum account application does not propose to seek Commission approval for selection of a preferred pipeline system before proceeding to Phases 2 and 3. Per the Phase 1 planned activities listed on page 23-25 of the Memorandum Account Application, at the conclusion of Phase 1, engineering project options and alternatives which have been evaluated for feasibility per the listed Phase 1 activities will be presented as part of a comprehensive status update to the Commission, which will indicate SoCalGas's next steps with respect to Phases 2 and 3. Per the Phase 2 planned activities listed on page 25-27 of the Memorandum Account Application, the preferred option(s) to be further developed will be evaluated and selected as part of this phase. SoCalGas would make this, or these if multiple cases are selected for further engineering development, selection based on criteria listed on pages 26-27 of the Memorandum Account Application. The memorandum account application anticipates that the CPCN process at the end of Phase 3 would include a review and approval of the preferred pipeline system.

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QUESTION 7:

Please refer to SoCalGas' Application in this proceeding at page 24. Please provide the workpapers and other documents that provide the basis for SoCalGas' estimate that Phase 1 would cost an estimated \$26 million. Please include a breakdown of the itemized costs that comprise the \$26 million estimate.

RESPONSE 7:

Please see response and attachments to data request PAO-01, Question 2.

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QUESTION 8:

Please refer to SoCalGas' Application in this proceeding at page 27. Please provide the workpapers and other documents that provide the basis for SoCalGas' estimate that Phase 2 would cost an estimated \$92 million. Please include a breakdown of the itemized costs that comprise the \$92 million estimate.

RESPONSE 8:

Please see response and attachments to data request PAO-01, Question 2.

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QUESTION 9:

Please refer to SoCalGas' Application in this proceeding at pages 27-28. Please provide all workpapers and other documents with SoCalGas' estimates for the potential costs of each of the items that are listed as key elements of Phase 3.

RESPONSE 9:

Please see response and attachments to data request PAO-01, Question 2.

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QUESTION 10:

Please refer to SoCalGas' Application in this proceeding at page 29. What specific technical assistance does SoCalGas stand ready to provide on hydrogen combustion and air quality research? Is SoCalGas currently providing this assistance? If so, what FERC account(s), cost center(s), and internal order(s) is SoCalGas booking the cost of this assistance to? Please state the purpose of each cost center and internal order identified. In addition, please provide all communications between SoCalGas and any outside entities related to this technical assistance.

RESPONSE 10:

SoCalGas is staffed with numerous subject matter experts (SME) in science, engineering, industrial process technology, and environmental policy. These SMEs collaborate with many of the world's top institutions—including the U.S. Department of Energy (DOE), the National Renewable Energy Laboratory (NREL), the California Energy Commission (CEC), Gas Technology Institute (GTI), Caltech, South Coast Air Quality Management District (SCAQMD), the University of California, and Stanford University— to develop and demonstrate transformational products and technologies that promote decarbonization across the entire natural gas value chain. These activities enable SoCalGas to identify the latest technology developments and leverage a network of relationships with experts at local, state, and federal agencies.

The referenced statement in the Memorandum Account Application was forward-looking. Specific technical assistance that SoCalGas could provide on hydrogen combustion and air quality will be dependent on the specific questions or concerns posed by the relevant stakeholder, and include the latest research as it relates to the question and the particular hydrogen combustion technology at issue. The accounting for such costs (e.g., FERC accounts, cost centers and internal orders), if any, would be dependent on the specific question posed and internal SMEs involved in the response.

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QUESTION 11:

Please refer to SoCalGas' Reply to Protests and Responses at 40: "to the extent permitted by law, SoCalGas intends to employ the Project to transport green hydrogen to the Los Angeles Basin—i.e., hydrogen produced through electrolysis using renewable energy."

- a. Please explain why SoCalGas included the caveat that it would employ the Project to transport green hydrogen "to the extent permitted by law." Does this sentence indicate that legal constraints could prevent the Company from using the Project to exclusively transport green hydrogen? If yes, please identify the relevant legal constraints.
- b. How does SoCalGas intend to minimize the use of the Project to transport nongreen hydrogen?

RESPONSE 11:

- a. SoCalGas objects to this request to the extent the question calls for legal conclusion. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Angeles Link has been proposed as a green hydrogen energy transport system. SoCalGas notes that the Commission is vested with broad authority, and SoCalGas will operate the system in accordance with applicable Public Utilities Code provisions, Commission orders, and approved tariffs.

- b. SoCalGas objects to this request to the extent the question assumes facts and calls for speculation. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Angeles Link has been proposed as a green hydrogen energy transport system. SoCalGas notes that the Commission is vested with broad authority, and SoCalGas will operate the system in accordance with applicable Public Utilities Code provisions, Commission orders, and approved tariffs.

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QUESTION 12:

Please refer to SoCalGas' Reply to Protests and Responses at 41. Does SoCalGas seek permission to record costs in the memorandum account that it expends prior to the resolution of this proceeding, such as the cost of stakeholder meetings in April and May of 2022? If yes, please identify all of the costs already expended that SoCalGas intends to book to a memorandum account.

RESPONSE 12:

The term "expends" is not defined in the data request. In answering this question, SoCalGas understands the term "expends" to mean invoiced and paid.

Yes, SoCalGas does intend to record costs in the memorandum account that it expends prior to the resolution of this proceeding. See Application at page 43: ("**Requested Effective Date** SoCalGas seeks authorization for the Memo Account as of the time of the filing of this Application. Under Public Utilities Code section 1731(a), the Commission "may set the effective date of an order or decision before the date of issuance." In light of the need to commence study and design expeditiously in order to meet the ambitious climate mandates summarized herein, the ability to record costs from a date earlier than the date of any Commission decision on the Application is appropriate."). Upon approval of the memorandum account, costs outlined in the memorandum account expended as of February 17, 2022, including the costs of the referenced stakeholder meeting which is in line with Phase 1 stakeholder engagement costs, will be recorded to the memorandum account. As of the date of tendering this data request response, SoCalGas has not yet expended any costs it will book to the memorandum account. However, SoCalGas expects to expend costs, including engineering, legal, environmental and stakeholder costs, in the near future.

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QUESTION 13:

Please identify that FERC account(s), cost center(s) and internal order(s) that SoCalGas has used to record the public relations costs it has already incurred related to the Angeles Link Project. Please state the purpose of each cost center and internal order identified. Your answer should include information about how SoCalGas recorded the costs of the following:

- a. Green Hydrogen: The New Star of the Clean Energy Revolution, HuffPost (Mar. 22, 2022), https://www.huffpost.com/entry/the-angeleslink_n_62044c39e4b0e224afc2374d.
- b. Here's Everything You Need to Know About the Largest Green Hydrogen Plan in the US, BuzzFeed (Mar. 23, 2022), <https://www.buzzfeed.com/socalgas/hereseverything-you-need-to-know-about-the-largest-green>

RESPONSE 13:

The term "public relations" is not defined in the data request. In answering this question, SoCalGas understands the term "public relations" to mean paid advertisements.

Angeles Link public relations costs were charged to FERC Account FG4264002200, Cost Centers 2200-2204 and 2200-2282, and Internal Order 300819943. The purpose of Internal Order 300819943, which settles to FERC Account FG4264002200 for certain civic, political, and related activities, is to track below-the-line labor and non-labor costs for Angeles Link. The purpose of Cost Center 2200-2204 is to track costs spent by SoCalGas's Strategic Initiatives department. The purpose of cost center 2200-2282 is to track costs spent by SoCalGas's Communication, Local Government & Community Affairs department.

- a. Costs associated with this article were charged to internal order 300819943, Cost Center 2200-2204, and FERC account FG4264002200.
- b. Costs associated with this article were charged to internal order 300819943, Cost Center 2200-2204, and FERC account FG4264002200.

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QUESTION 14:

Please provide copies of all paid media related to the Angeles Link Project that SoCalGas has funded.

RESPONSE 14:

The term “paid media” is not defined in the data request. In answering this question, SoCalGas understands the term “paid media” to mean external marketing efforts that involve a paid advertisement placement.

Please see attachment for copies of paid media related to the Angeles Link Project.

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QUESTION 15:

Please identify that FERC account(s), cost center(s) and internal order(s) that SoCalGas has used to record the government affairs costs it has already incurred related to the Angeles Link Project. Please state the purpose of each cost center and internal order identified. Your answer should include information about how SoCalGas recorded the labor costs of any public affairs staff related to communications related to the Angeles Link Project to local, state, or federal government officials or staff.

RESPONSE 15:

The terms “government affairs” and “public affairs” are not defined in the data request. In answering this question, SoCalGas understands the terms “government affairs” and “public affairs” to mean preparing for or communicating with public officials.

Angeles Link-related government affairs and public affairs staff costs were charged to FERC Account FG4264002200 and Internal Order 300819943. The purpose of Internal Order 300819943, which settles to FERC Account FG4264002200 for certain civic, political, and related activities, is to track below-the-line labor and non-labor costs for Angeles Link. The cost centers and their purpose are listed below:

<u>Cost Center</u>	<u>Title/Purpose</u>
2200-2620	Assistant Controller – SCG
2100-3162	Regulatory Affairs SDG&E & SCG
2100-3991	San Francisco Operations
2200-0229	Customer Energy Solutions
2200-0230	C&I Services SE Sales Region
2200-0231	C&I Services NW Sales Region
2200-0232	C&I Services SE Sales Region
2200-0251	Energy Markets Sales
2200-0261	Strategy, Sustainability & Environmental
2200-0536	Southeast Region - Customer Services
2200-0805	Regional Public Affairs - Anaheim
2200-0811	Regional Public Affairs - LA
2200-0818	Regional Public Affairs - Redlands
2200-0825	Regional Public Affairs - Chatsworth

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2200-0852	Customer Clean Energy Solutions
2200-1022	Clean Energy Innovations
2200-1212	Environmental Policy
2200-1217	Regulatory Policy
2200-2061	C&I Services NW Sales Region
2200-2076	Marketing Communications
2200-2101	CEO - SoCalGas
2200-2143	Digital Engagement
2200-2188	Emp/Exec Communications & Creative Services
2200-2200	Environmental
2200-2204	Strategic Initiatives
2200-2208	Regional Public Affairs
2200-2215	Strategic Comms & Engagement
2200-2282	Comms, Local Government& Community Affairs
2200-2285	Media Relations
2200-2288	Environmental Affairs
2200-2318	President - SoCalGas
2200-2332	General Counsel
2200-2334	Regulatory
2200-2338	Litigation & Environmental
2200-2339	Community Relations
2200-2396	Energy & Environmental Policy
2200-2401	San Francisco Operations
2200-2504	Public Policy & Legislative Affairs
2200-2516	Market Development
2200-2576	SE Region: Proj Outreach
2200-2594	Infrastructure
2200-2609	Sacramento Operations
2200-2614	Business Development

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QUESTION 16:

Please provide copies of all communications related to the Angeles Link Project from SoCalGas to local, state, or federal government officials or staff.

RESPONSE 16:

SoCalGas objects to this request as overly broad and unduly burdensome to the extent it seeks “all communications” “related to” the Angeles Link Project. SoCalGas further objects to this request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving the foregoing objections, SoCalGas provides the following examples of communications from or on behalf of SoCalGas with local, state, or federal government officials related to the Angeles Link Project.

As part of its communication efforts, SoCalGas informed local governments in its service territory, state and federal legislators and administrators, and regulators at the regional, state and federal level about the Angeles Link announcement. The attached email template and resources such as the attached fact sheets, press release (available here: <https://newsroom.socalgas.com/press-release/socalgas-proposes-to-develop-united-states-largest-green-hydrogen-energy>) and Angeles Link website were included in those communications. Additionally, the attached “Project Overview” document was provided to the Governor’s Office before filing the Angeles Link application.