



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Application of Southern California Gas Company (U 904 G), San Diego Gas & Electric Company (U 902 G), Pacific Gas and Electric Company (U 39 G), and Southwest Gas Corporation (U 905 G) regarding Hydrogen-Related Additions or Revisions to the Standard Renewable Gas Interconnection Tariff.

Application 20-11-004  
(Filed December 4, 2020)

**REPLY COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL ON  
RULING SUPERSEDING ADMINISTRATIVE LAW JUDGE'S RULING  
FILED ON MARCH 10, 2021**

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April 8, 2021

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**I. Introduction**

The California Hydrogen Business Council (CHBC)<sup>1</sup> appreciates the opportunity to provide reply comments on the *RULING SUPERSEDING ADMINISTRATIVE LAW JUDGE’S RULING FILED ON MARCH 10, 2021* (“Ruling”), filed on March 11, 2020. The CHBC agrees with the comments provided by the Green Hydrogen Coalition (GHC)<sup>2</sup> and the Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), and Southwest Gas Corporation (SWG) (collectively, the Joint Utilities)<sup>3</sup>. The CHBC disagrees with the comments made by The Public Advocates Office at the California Public Utilities Commission (Cal Advocates)<sup>4</sup>. Our comments below provide detailed explanations.

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<sup>1</sup> The CHBC is comprised of over 120 companies and agencies involved in the business of hydrogen. Our mission is to advance the commercialization of hydrogen in the energy sector, including transportation, goods movement, and stationary power systems to reduce emissions and dependence on oil. The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies. CHBC Members are listed here: <https://www.californiahydrogen.org/aboutus/chbc-members/>

<sup>2</sup> <http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=374635955>

<sup>3</sup> <http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=374635957>

<sup>4</sup> <http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=374626955>

## II. Reply Comments

CHBC disagrees with Cal Advocates' comments. Similarly to the Commission's proposed ruling, Cal Advocates does not take into account how the University of California Riverside (UCR) study and the proposed California Energy Commission (CEC) project would differ, both in scope, funding, and timeliness, from the Application submitted by the Joint Utilities.

The CHBC supports an efficient approach and making the best use of ratepayer funds, as Cal Advocates proposes, but believes the best way to do so is by coordinating these three efforts to create a high quality and broadly applicable data set that can help expedite reductions in the carbon intensity of the natural gas system, while also providing additional services, like renewable transportation fuel, back-up power, and resilience.

As such, the CHBC reiterates its urgent push to accelerate, not delay or reject, the proposed demonstration projects for hydrogen injection in the three types of plastic, steel, and mixed plastic and steel pipelines on parallel tracks. The CHBC additionally requests that the proposed utility demonstration program and associated memorandum accounts be approved expeditiously.

The GHC, in their comments, made three recommendations<sup>5</sup> with which the CHBC agrees:

- **Recommendation 1:** The proposed Demo Program and Memorandum Accounts should be approved without delay.
- **Recommendation 2:** The UCR Study should be evaluated alongside other Tariff issues by parties and the Commission in R.13-02-008, as indicated in both the Scoping Memo and the February 3, 2021 ALJ Rulings.
- **Recommendation 3:** Utilities should conduct their various proposed projects simultaneously rather than sequentially.

The CHBC also appreciates the Joint Utilities comments, providing additional information on the timeline, role of the UCR study and potential CEC project, and funding. The CHBC believes those comments address the Commission's concerns discussed in the Proposed Decision.

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<sup>5</sup> GHC comments, page 3

### III. Conclusion

The CHBC thanks the Commission for considering these reply comments and reiterates the recommendation that the Commission approve the Application and proceed without delay in the development of simultaneous utility applications to reduce GHG emissions economy-wide.

Respectfully submitted,

Dated: April 8, 2021



Emanuel Wagner  
Deputy Director

**California Hydrogen Business Council**