



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

11/27/24

04:59 PM

Complaint No.: **C2411013**

Communities for a Better Environment
(CBE),

Complainant,

vs.

Southern California Gas Company,

Defendant.

COMPLAINT AND REQUEST FOR RELIEF AGAINST SOUTHERN CALIFORNIA GAS
COMPANY FOR FAILURE TO FOLLOW AND COMPLY WITH PUBLIC UTILITIES CODE
SECTION 702

Theodore Caretto (State Bar No. 347221)
Shana Lazerow (State Bar No. 195491)
Communities for a Better Environment
6325 Pacific Blvd., Ste. 300
Huntington Park, CA 90255
Telephone: (323) 826-9771
Email: theodore@cbecal.org
slazerow@cbecal.org

Dated: November 27, 2024

1 **COMPLAINT AND REQUEST FOR RELIEF AGAINST SOUTHERN CALIFORNIA**
2 **GAS COMPANY FOR FAILURE TO FOLLOW AND COMPLY WITH PUBLIC**
3 **UTILITIES CODE SECTION 702**

4 Pursuant to section 1702 of the California Public Utilities Code and Decision 24-09-034,¹
5 Communities for a Better Environment (“CBE”) submits this complaint against Southern
6 California Gas Company (“SoCalGas”) for violating Commission Decision (“D.”) 22-12-055. As
7 set forth below, SoCalGas’s actions violate the Public Utilities Code and Public Utilities
8 Commission Rules.

8 **Summary of the Complaint**

9 This complaint addresses SoCalGas’s failure to comply with D.22-12-055’s mandates to
10 conduct community engagement and to study the environmental justice impacts of SoCalGas’s
11 proposed Angeles Link Pipeline project. SoCalGas’s conduct is prohibited under Section 702 of
12 the Public Utilities Code Section (the “Code”), which states that “[e]very public utility shall obey
13 and comply with every order, decision, direction, or rule made or prescribed by the commission in
14 the matters specified in this part, or any other matter in any way relating to or affecting its
15 business as a public utility, and shall do everything necessary or proper to secure compliance
16 therewith by all of its officers, agents, and employees.”²

17 CBE asserts that SoCalGas intentionally excluding non-Los Angeles based organizations
18 from the community group engagement process, and that this exclusion, in turn lead to failures to
19 study and model project impacts, especially environmental justice impacts outside of the Los
20 Angeles area. CBE requests the California Public Utilities Commission (the “Commission”) find
21 these failures to have occurred, and that these failures violate Code Section 702. CBE requests the
22 Commission order SoCalGas to remedy the failures before proceeding with the Angeles Link
23 project. CBE also requests that the Commission appoint a staff member to ensure that future
24 actions by SoCalGas related to the Angeles Link project do not violate Commission decisions,
25 rulings, or orders.

26 _____
27 ¹ D. 24-09-034, *Decision Partially Granting the Petition to Modify Decision 22-12-021 and*
28 *Closing Proceeding*, at 9 (Oct. 2, 2024).

² Pub. Util. Code section 702.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

The Parties

1. Complainant CBE is a grassroots environmental justice organization with Southern California offices at 6325 Pacific Blvd. Ste 300; Huntington Park, CA 90255, and 113 E. Anaheim St., Wilmington, CA 90744; (323) 826-9771.
2. Defendant SoCalGas is a corporation doing business in the State of California as a gas utility. SoCalGas’ principal address is 555 West 5th Street, Los Angeles, CA 90013.
3. Attorney representatives of CBE are Theo Caretto and Shana Lazerow.
4. The SoCalGas representative is currently unknown to CBE.

Facts

A. Application

5. SoCalGas is an investor-owned utility company under the Commission’s jurisdiction.
6. On February 17, 2022, SoCalGas submitted the Application of Southern California Gas Company (U-904G) for Authority to Establish a Memorandum Account for the Angeles Link Project (A. 22-02-007) (the “Application”) to the Commission.
7. The Application explains that the proposed Angeles Link project consists of “one or more trunk transmission pipelines that would run from green hydrogen generation sources including, but not limited to, the Central Valley, Mojave Desert/Needles, or Blythe area, into one or more delivery points in the Los Angeles Basin” supported by compressor stations. (Application at 22.)
8. In the Application, SoCalGas “recognize[d] that a broad range of stakeholders is likely to have an interest in the study and development of this Project” and explained that SoCalGas had or intended to engage with a number of entities including LADWP, environmental groups, technical experts, HyDeal LA, UC Irvine, UC Davis, Columbia University, the CPUC’s Energy and Safety Divisions, the California Energy Commission, the California Air Resources Board, and the South Coast Air Quality Management District. (*Id.* at 23, 28.)
9. In the Application, SoCalGas stated its belief that “the Project could alleviate many environmental justice concerns.” (*Id.* at 29.)

1 10. In the Application, SoCalGas stated its plan to “engage and respond to community
2 questions, concerns, and needs—particularly those concerns expressed by local
3 environmental justice communities,” at a later stage, once a route had been identified. (*Id.*)

4 11. Between March 21 and 22, 2022 fourteen parties responded to or protested A. 22-02-007

5 **B. Decision**

6 12. The Commission issued its Decision Approving the Angeles Link Memorandum Account
7 to Record Phase One Costs (D. 22-12-055) (“Decision”) on December 20, 2022.

8 13. The Decision adopted the following condition upon approval: “SoCalGas shall conduct
9 quarterly meetings with stakeholders, including quarterly meetings with [Project Advisory
10 Group aka] PAG members. SoCalGas shall also identify and invite participation from
11 community-based organizations (CBOs), including DAC and ESJ groups, that may
12 potentially be impacted by the Project.” (D. 22-12-055, at 38.)

13 14. The Decision noted that “Intervenors are particularly concerned about the Project’s
14 potential environmental impacts to DAC and ESJ communities” along the route of the
15 pipeline, and at its starting point, “[t]hey question whether the Project will further increase
16 pollution in these communities through hydrogen leaking from pipelines and NOx
17 emissions from using hydrogen in industrial facilities and electric generation, and whether
18 the Project will divert scarce water resources from local communities to produce
19 hydrogen.” (*Id.* at 36.)

20 15. “Therefore” the decision reasoned SoCalGas must engage with disadvantaged and “ESJ”
21 communities “to address any potential impacts the Project has on these communities.” (*Id.*
22 at 36-37.)

23 16. Following this discussion, the Decision found that SoCalGas’s commitment to engage and
24 consult with stakeholders serves the public interested, because it “ensures that all interests
25 affected by the Project are considered in the planning process.” (*Id.* at 62, Finding of Fact
26 6.)

27 17. Despite the Application’s proposal to engage with local environmental justice communities
28 once the “Project progresses to an identified route and design,” so that SoCalGas can

1 engage and respond to community questions, concerns, and needs (Application at 29.), the
2 Decision found that early-stage stakeholder engagement is beneficial to the public interest
3 because SoCalGas must learn from potentially impacted communities in order to “identify
4 and address potential impacts of the Project on disadvantaged and environmental justice
5 communities.” (Decision at 65, Finding of Fact 26.)

6 18. Decision 22-12-055 set out clear parameters for SoCalGas to pursue its desired exploration
7 of the massive new Angeles Link Project, concluding that if SoCalGas goes forward with
8 investigating the potential project:

- 9 a. SoCalGas should engage with disadvantaged and environmental justice
10 communities through the stakeholder engagement process on a quarterly basis to
11 address any potential impacts the Project has on these communities. (*Id.* at 69,
12 Conclusion of Law 10.)
- 13 b. SoCalGas should make the data, findings, and results of the Phase One studies
14 available to the public. The data, findings, and results of the Phase One studies
15 should be unredacted. (*Id.* at 69, Conclusion of Law 11.)
- 16 c. SoCalGas should proactively identify and invite involvement from the CBOs,
17 including ESJ and DAC groups, that serve the communities that will be impacted
18 by the Angeles Link Project. (*Id.* at 70, Conclusion of Law 22.)
- 19 d. SoCalGas should consider how to meaningful engage with CBOs, including DAC
20 and ESJ groups, either by inviting them to join the quarterly PAG meetings or
21 through some other stakeholder engagement process, and provide compensation to
22 CBOs for their participation. (*Id.* at 70, Conclusion of Law 23.)
- 23 e. SoCalGas should submit to the Commission’s Deputy Executive Director for
24 Energy and Climate Policy quarterly reports to provide an update on the progress of
25 the Angeles Link Project and the Phase One activities. (*Id.* at 71, Conclusion of
26 Law 28.)
- 27 f. SoCalGas should be prohibited from recording any public outreach costs in the
28 Angeles Link Memo Account during Phase One. (*Id.* at 72, Conclusion of Law 33.)

1 g. SoCalGas should be prohibited from recording costs related to engaging with
2 public officials or legislators in the Memo Account. (*Id.* at 72, Conclusion of Law
3 34.)

4 19. The Decision ordered that for costs of the Angeles Link Memorandum Account to be
5 recoverable, SoCalGas must “conduct quarterly stakeholder engagement meetings,
6 including quarterly meetings with Planning Advisory Group members. SoCalGas shall also
7 identify and invite participation from community-based organizations that may potentially
8 be impacted by the Project, including disadvantage communities and environmental social
9 justice groups, in either the quarterly Planning Advisory Group meetings or some other
10 stakeholder engagement process.” (*Id.* at 74, Ordering Paragraph 3(e).)

11 20. The Decision ordered SoCalGas to “proactively identify and invite the involvement from
12 CBOs, including ESJ and DAC groups, that are equipped to serve the communities that
13 will be impacted by the Angeles Link Project.” (*Id.* at 78, Ordering Paragraph 8(b).)

14 21. SoCalGas began its public facing quarterly community group engagement and reporting
15 efforts in the first quarter of 2023.

16 **C. Outreach and Quarterly Meetings**

17 **First Quarter 2023**

18 22. On February 23, 2023, Maryam Brown, the President of SoCalGas, “personally” invited
19 *some* parties in the A. 22-02-007 proceeding to join a “Planning Advisory Group” for the
20 Angeles Link Project. The California Environmental Justice Alliance, represented by CBE
21 in A.22-02-007, did not receive an advisory group invitation. Exhibit A.

22 23. On February 27, 2023, CBE contacted SoCalGas’s legal counsel to inform SoCalGas that
23 CBE and CEJA had not received invitations to the advisory group. Exhibit B.

24 24. On February 27, 2023, CBE’s Legal Director Shana Lazerow received an invitation to join
25 the planning advisory group. Exhibit C.

26 25. The February 27, 2023, invitation explained that “SoCalGas created the PAG to
27 collaborate on project design, share technical advice, and collect needed feedback from
28 stakeholders.” *Id.*

- 1 26. On February 28, 2023, Southern California Gas sent an email to the A. 22-02-007 service
2 list informing parties that “each Party of Service List for A.22-02-007 received an
3 invitation to participate in the Angeles Link Planning Advisory Group (PAG).” Exhibit D.
- 4 27. On February 28, 2023, both The Utility Reform Action Network and the California Public
5 Advocates Office separately responded to SoCalGas’ email notifying SoCalGas that their
6 respective organizations did not receive invitations to the advisory group. *Id.*
- 7 28. On March 9, 2023, CBE staff member Sylvia Arredondo received an invitation to join the
8 Angeles Link “Community-Based Organization (CBO) Stakeholder Group.” Exhibit E.
- 9 29. Although SoCalGas had the contact information of and had been in direct contact with
10 CBE’s legal counsel in relation to the Angeles Link project, the community group
11 invitation was sent only to a single staff member, a person who was not connected to A.
12 22-02-007.
- 13 30. According to the March 9, 2023 invitation, SoCalGas created the CBO Stakeholder Group
14 to represent a “broad and diverse group of CBOs, each with a unique set of perspectives
15 and experience.” *Id.*
- 16 31. The March 9, 2023 invitation linked to the Commission’s decision, and stated that “[t]he
17 purpose of this group is to create opportunities for feedback on, and information sharing
18 regarding, a proposed clean renewable hydrogen pipeline system that could deliver safe,
19 clean renewable, reliable energy to the Los Angeles region.” The invitation did not inform
20 invitees that SoCalGas had been ordered to “proactively identify and invite the
21 involvement from CBOs, including ESJ and DAC groups, that serve the communities that
22 will be impacted by the Angeles Link Project.” (Decision at 78, Ordering Paragraph 8(b);
23 Exhibit E.)
- 24 32. The March 9, 2023 invitation specified that “organizations that represent disadvantaged
25 communities in the Los Angeles Basin” were invited to join the community group. Exhibit
26 E.
- 27 33. On March 15, 2023, CBE attended the advisory group’s first meeting.
- 28 34. On March 16, 2023, CBE attended the community group’s first meeting.

- 1 35. At the March 16, 2023 community group meeting, SoCalGas notified community groups
2 that an application would be required in order to participate in the community group.
3 Exhibit F at 18.
- 4 36. The SoCalGas community group application placed restrictions on what community
5 groups could participate in the Angeles Link community engagement process. Exhibit G at
6 2.
- 7 a. The application restricted participating organizations to those located in the Los
8 Angeles Basin. *Id.*
- 9 b. The application also restricted participation to organizations with a minimum
10 required age, demonstrated prior community outreach expertise and required
11 applications to answer application questions. *Id.*
- 12 c. SoCalGas set the application deadline as April 28, 2023. *Id.* at 1.
- 13 37. On April 12, 2023, CBE contacted SoCalGas via email to request a list of all organizations
14 who were invited to join the community group. Exhibit H.
- 15 38. On April 14, 2023, CBE submitted its first feedback letter on the Angeles Link project to
16 SoCalGas. Exhibit I.
- 17 39. The April 14, 2023 letter to SoCalGas expressed CBE's opinion that SoCalGas's
18 community engagement efforts did not comply with the Decision because SoCalGas
19 limited community group participation to only Los Angeles based organizations, prevented
20 virtual meeting attendees from speaking by keeping their microphones forcibly muted, and
21 for using the meeting as a public relations opportunity. *Id.*
- 22 40. The April 14 letter explained that Angeles Link modeling around local impacts and
23 pipeline routing would suffer if impacted communities are excluded from participation. *Id.*
24 at 2.
- 25 41. On April 24, 2023, CBE renewed its request for a list of invitees to the community group.
26 Exhibit H.
- 27 42. On April 26, 2023, two days before the community group application deadline, SoCalGas
28 provided the requested information to CBE and asked to schedule a meeting with CBE to

- 1 discuss upcoming deadlines and CBE’s questions. *Id.*
- 2 43. CBE and SoCalGas met virtually on April 27, 2023, and SoCalGas revealed that the
- 3 application requirements and deadline would not to be enforced but that outreach outside
- 4 of LA would not be heavily pursued.
- 5 44. At the April 27, 2023 meeting, CBE stated its opinion that SoCalGas should perform
- 6 outreach along the proposed routes and drew SoCalGas’s attention to CBE’s April 14,
- 7 2023 feedback letter.
- 8 45. On May 9, 2023, SoCalGas filed its quarterly report for the first quarter of 2023. Exhibit F.
- 9 46. Appendix 1 to the Q1 2023 quarterly report details the invitee and attendee list for the first
- 10 advisory group and community group meetings. Exhibit J at 2-5.
- 11 47. The appendix lists 46 organizations invited to be “CBO Organization Member[s]”. *Id.* at 5.
- 12 a. Several organizations on the list are not community-based organizations.
- 13 b. Of 46 invitees, at least 19 received financial contributions from SoCalGas in 2021,
- 14 2022, or 2023. Exhibit K; Exhibit L; Exhibit M.
- 15 c. The majority of those 19 received financial contributions from SoCalGas on more
- 16 than one occasion. *Id.*
- 17 d. Despite identifying Angeles Link impacts to the “Central Valley, Mojave
- 18 Desert/Needles, or Blythe area,” along with Los Angeles, by name in the
- 19 Application, SoCalGas did not invite any organizations based in the Central Valley,
- 20 Mojave Desert, Needles, or Blythe area to the community group meeting.
- 21 Application at 22; Exhibit J.
- 22 48. Appendix 1 lists 19 organizations who attended the Angeles Link Q1 2023 community
- 23 group quarterly meeting held on March 16, 2023.
- 24 a. Of the 19 organizations who joined the first community group meeting 18 were Los
- 25 Angeles based organizations who describe themselves as serving communities in
- 26 Los Angeles. Exhibit J.
- 27 b. All 19 organizations that joined the first community meeting are based or
- 28 headquartered in Los Angeles. *Id.*

- 1 c. All 19 organizations that joined the first community meeting focus on communities
2 in Los Angeles or the Bay Area. *Id.*
- 3 d. Of 19 organizations that joined the first community meeting, at least 10 received
4 financial contributions from SoCalGas on one or more occasions between 2021 and
5 2023. Exhibit K; Exhibit L; Exhibit M.

6 Second Quarter 2023

7 49. On June 22, 2023, SoCalGas held the second quarterly community group meeting.

8 50. In the second quarterly report of 2023, SoCalGas reported decreased community-based
9 organization outreach, inviting 29 organizations to the community group meetings. Exhibit
10 N at 5.

- 11 a. Of 29 organizational invitees, 23 focused on Los Angeles or the Bay Area while the
12 remainder had a statewide or broader focus. *Id.*
- 13 b. Of the 29 invitees, no organizations were based in or focused specifically on
14 communities outside of Los Angeles along proposed pipeline routes. *Id.*
- 15 c. Of 29 invitees, 9 received financial contributions from SoCalGas in 2021, 2022, or
16 2023. Exhibit K; Exhibit L; Exhibit M.

17 51. 21 organizations joined the second quarterly meeting of 2023. Exhibit N at 4.

- 18 a. Of those 21 organizations, 17 were based in or focused specifically on communities
19 in Los Angeles along proposed pipeline routes. *Id.*
- 20 b. Of the 21 attendees no organizations were based in or focused specifically on
21 communities outside of Los Angeles along proposed pipeline routes. *Id.*

22 Third Quarter 2023

23 52. On September 7, 2023, SoCalGas released a document entitled “Technical Approach for
24 Phase One Studies” which detailed SoCalGas’s intent to identify pipeline routes and the
25 pipeline’s air, water, and safety impacts. Exhibit O.

26 53. On September 26, 2023, SoCalGas held the third quarterly community group meeting.

27 54. On October 13 and November 3, 2023, CBE submitted letters of feedback to SoCalGas
28 informing SoCalGas of CBE’s opinion that they must “not proceed without informed

- 1 consent and forward-looking participation of impacted communities” because of the
2 Angeles Link project’s potential impacts in those communities. Exhibit P; Exhibit Q at 2.
- 3 55. CBE attached to the October and November 2023 letters of feedback the Equity Principles
4 for Hydrogen, a position statement demanding impacted community engagement on
5 hydrogen projects, signed by nine environmental justice organizations, three of which are
6 located in communities along pipeline routes, but not within SoCalGas’ planned area of
7 engagement. Exhibit P at 7; Exhibit Q at 4.
- 8 56. The October and November letters detailed CBE’s own communities’ concerns around the
9 pipeline’s impacts in the Los Angeles area, and emphasized that local engagement was
10 critical to understanding the projects impacts and special considerations for each
11 community. Exhibit P; Exhibit Q.
- 12 57. In the third quarterly report of 2023, SoCalGas reported invitations to the same 29
13 organizations invited to participate in the second quarter of 2023. Exhibit R at 18.
- 14 a. Of the 29 invitees, no organizations were based in or focused specifically on
15 communities outside of Los Angeles along proposed pipeline routes. *Id.*
- 16 58. 21 organizations joined the third quarterly meeting of 2023. *Id.* at 8.
- 17 a. Of those 21 organizations, 18 were organizations who are based in and focus on
18 communities in Los Angeles or the Bay Area. *Id.*
- 19 b. Of the 21 attendees no organizations were based in or focused specifically on
20 communities outside of Los Angeles along proposed pipeline routes. *Id.*
- 21 c. In addition to those organizations listed as invited, SoCalGas reported that the
22 Sanga Monica College Eco Action club, a Los Angeles based organization, and the
23 Society of Native Nations, a nationwide organization, joined workshops during Q3
24 2023. *Id.*

25 Fourth Quarter 2023

- 26 59. On December 13, 2023, SoCalGas held the fourth quarterly community group meeting.
- 27 60. In the fourth quarterly report of 2023, SoCalGas again reported a decrease in community
28 group engagement. Exhibit S at 6.

- 1 a. The same 29 organizations that were invitees to in Q2 and Q3 of 2023 were invited
2 to the Q4 stakeholder meeting. *Id.* at 4-5.
- 3 b. Of the 29 invitees, no organizations were based in or focused specifically on
4 communities outside of Los Angeles along proposed pipeline routes. *Id.*
- 5 61. Of 29 invited organizations, 12 attended the Q4 2023 quarterly meeting. *Id.* at 6.
- 6 a. Of the 12 organizations who joined, 10 were organizations who are based in and
7 focus on communities in Los Angeles or the Bay Area. *Id.*
- 8 b. Of the 12 attendees, no organizations were based in or focused specifically on
9 communities outside of Los Angeles along proposed pipeline routes. *Id.*

10 First Quarter 2024

- 11 62. On March 4, 2024, SoCalGas held the fifth quarterly community group meeting.
- 12 63. On March 29, 2024, CBE submitted a letter of feedback to SoCalGas responding to
13 Angeles Link study findings. CBE’s letter outlined several study areas such as water
14 resources, greenhouse gas emissions impacts, and hydrogen gas leakage that would impact
15 communities along the Angeles Link’s proposed routes that were excluded from
16 SoCalGas’ public engagement efforts. While CBE sought to outline key areas which
17 needed additional feedback and study, CBE’s lack of place-based knowledge or
18 community expertise severely limited its ability to give feedback on many community-
19 specific impacts outside of the Los Angeles area. Exhibit T.
- 20 64. In the first quarterly report of 2024, SoCalGas added an additional invitee, the “LA Black
21 Workers Center/Care at Work, UCLA Labor Center,” to the community group invitee list
22 bringing the total number of invitees to 30. Exhibit U at 9.
- 23 a. Of the 30 invited organizations, 24 focused on Los Angeles or the Bay Area while
24 the remainder had a statewide or broader focus. *Id.* at 9-10.
- 25 b. Of the 30 invitees, no organizations were based in or focused specifically on
26 communities outside of Los Angeles along proposed pipeline routes. *Id.*
- 27 65. In Q1 2024, quarterly community group meeting participation increased to 21 of the 30
28 invited organizations. *Id.* at 11.

- 1 a. Of the 21 attendees who joined, 18 were organizations who are based in and focus
2 on communities in Los Angeles or the Bay Area. *Id.*
3 b. Of the 21 attendees, no organizations were based in or focused specifically on
4 communities outside of Los Angeles along proposed pipeline routes. *Id.*

5 Second Quarter 2024

6 66. On May 3, 2024, SoCalGas released a refined pipeline corridor map outlining several
7 branching pipeline routes into the Los Angeles area. Exhibit V.

8 67. On June 18, 2024, SoCalGas held the sixth quarterly community group meeting.

9 68. In Q2 2024 CBE submitted five letters of feedback detailing concerns or omissions from
10 SoCalGas' draft project studies on the subjects of pipeline routing, economic impacts,
11 environmental justice, leakage, and safety. While CBE outlined key areas that needed
12 additional feedback and study, CBE's lack of place-based knowledge or community
13 expertise severely limited its ability to give feedback on many community-specific impacts
14 outside of the Los Angeles area. Exhibit W; Exhibit X; Exhibit Y; Exhibit Z; Exhibit AA.

15 69. The second quarterly report of 2024 featured the same 30 community group invitees as the
16 first quarter of 2024. Exhibit BB at 13-14.

- 17 a. Of the 30 invitees, no organizations were based in or focused specifically on
18 communities outside of Los Angeles along proposed pipeline routes. *Id.*

19 70. In Q2 2024, 18 of the 30 invited organizations attended the quarterly meeting. *Id.* at 15.

- 20 b. Of the 18 attendees who joined, 16 were organizations who are based in and focus
21 on communities in Los Angeles or the Bay Area. *Id.*

- 22 c. Of the 18 attendees, no organizations were based in or focused specifically on
23 communities outside of Los Angeles along proposed pipeline routes. *Id.*

24 71. In addition to standard community group outreach activities under the auspices of the
25 Commission Decision, SoCalGas also reported performing public relations outreach
26 activities, which it called "regional outreach efforts" in April and June 2024. Exhibit CC at
27 5.

28 72. These "regional outreach efforts" were reportedly directed toward organizations

1 representing agriculture, business/economic development, community-based organizations,
2 environmental justice organizations, environmental nongovernmental organizations, and
3 local government officials located “within the broader region of SoCalGas territory,
4 including the San Joaquin Valley, Santa Clarita Valley, Antelope Valley, and San
5 Fernando Valley to provide information about Angeles Link and offer them opportunities
6 to stay informed.” *Id.*

7 73. SoCalGas met with 29 organizations and did not record the costs associated with this
8 public relations activity. *Id.*

9 74. SoCalGas did not report the number of organizations, businesses, or individuals contacted
10 or the breakdown of organization or business type. *Id.*

11 75. SoCalGas did not claim memorandum account treatment for the costs of conducting this
12 outreach. *Id.*

13 Third Quarter 2024

14 76. On July 19, 2024, SoCalGas released their draft Routing Analysis and draft Environmental
15 and Social Justice Plan. The July 19, 2024 studies singled out several specific
16 disadvantaged communities as sites for pipeline construction. The July 19 studies
17 expressly demurred engaging these communities as part of their selection, deferring any
18 local community engagement to a later, hypothetical phase of the Angeles Link project.
19 Exhibit DD; Exhibit EE.

20 77. On July 26, 2024, SoCalGas released their draft Environmental Analysis. The July 26
21 study identified a single pipeline route variation which could reduce the pipelines traveled
22 distance through environmental justice communities but declined to study the variation.
23 SoCalGas failed to identify other variations which avoided environmental justice
24 communities in the draft Environmental Analysis. Exhibit FF.

25 78. On July 23, 2024, SoCalGas held the seventh quarterly community group meeting.

26 79. On August 2, 2024, CBE submitted a letter of feedback to SoCalGas regarding its Water
27 Resources Evaluation draft report. In the August 2 letter, CBE highlighted several
28 substantial impacts discussed in the draft report impacted communities not represented in

- 1 the community group. Exhibit GG.
- 2 80. On August 14, 2024, CBE submitted a letter of feedback regarding SoCalGas' Air
3 Emissions Assessment draft report. In the August 14 letter, CBE informed SoCalGas that
4 the analysis involved major air pollution issues in communities not represented by engaged
5 community groups, most importantly groups along the Angeles Link pipeline route and
6 near the proposed pipelines' inception point. Exhibit HH.
- 7 81. On August 30, 2024, CBE submitted two letters of feedback to SoCalGas regarding their
8 Environmental Social Justice Draft Engagement Plan and ESJ Screening and their
9 Preliminary Routing/Configuration Analysis draft report. In the August 30 letters, CBE
10 once again addressed community engagement explaining that delaying outreach to
11 impacted communities until shortly before or after critical infrastructure decisions are
12 made would strip these communities of meaningful opportunity to participate in the
13 process. Exhibit II; Exhibit JJ.
- 14 82. On September 6, 2024, CBE submitted a letter of feedback regarding SoCalGas'
15 Environmental Analysis draft report. The Environmental Analysis draft report addressed
16 specific environmental impacts in the San Joaquin Valley as well as Fresno, Kings, and
17 Kern Counties. In the September 6 letter, CBE once again reminded SoCalGas that
18 community engagement involves engaging with the impacted communities. Exhibit KK.
- 19 83. The third quarter of 2024 featured the same 30 community group invitees as the first
20 quarter of 2024. Exhibit LL at 4-5.
- 21 a. Of the 30 invitees, no organizations were based in or focused specifically on
22 communities outside of Los Angeles along proposed pipeline routes. *Id.*
- 23 84. In Q3 2024, 14 of the 30 invited organizations attended the quarterly meeting. *Id.* at 6.
- 24 a. Of the 14 attendees who joined, 10 were organizations who are based in and focus
25 on communities in Los Angeles or the Bay Area. *Id.*
- 26 b. Of the 14 attendees, no organizations were based in or focused specifically on
27 communities outside of Los Angeles along proposed pipeline routes. *Id.*
- 28 85. SoCalGas also continued its public relations outreach activity in Q3 2024, meeting with an

1 additional 3 organizations. Exhibit MM at 6-7.

2 **First Cause of Action**

3 **(Violations of a Commission Order and Public Utilities Code Section 702)**

4 86. CBE restates the facts alleged in paragraphs 1-85 and incorporates them herein.

5 87. Through the conduct alleged herein, SoCalGas has engaged in recurring violations of
6 Commission orders in D. 22-12-055 by generally conducting community engagement in a
7 manner that excludes communities and organizations that serve communities along the
8 proposed routes of the Project identified first in SoCalGas’s Application and refined
9 throughout Phase 1 of the Angeles Link project study process.

10 88. Particularly, SoCalGas violated Commission orders in D. 22-12-055 by:

- 11 a. Failing to act on the Decision’s findings that early-stage engagement with
12 environmental justice communities serves the public interest.
- 13 b. Failing to “proactively identify and invite the involvement from CBOs, including
14 ESJ and DAC groups, which are equipped to serve the communities that will be
15 impacted by the Angeles Link Project” as set out in Decision Conclusion of Law
16 22.
- 17 c. Failing to “also identify and invite participation from community-based
18 organizations that may potentially be impacted by the Project, including
19 disadvantage communities and environmental social justice groups” as set out in
20 Decision Ordering Paragraph 3(e).
- 21 d. Failing to “proactively identify and invite the involvement from CBOs, including
22 ESJ and DAC groups, that are equipped to serve the communities that will be
23 impacted by the Angeles Link Project”, as set out in Decision Ordering Paragraph
24 8(b).
- 25 e. Failing to identify and invite involvement from CBOs that serve the communities
26 that will be impacted by the Angeles Link Project.
- 27 f. Excluding from community group participation organizations outside of the Los
28 Angeles area.

1 g. Failing to conduct additional community group outreach after eliminating the Los
2 Angeles only community group restriction.

3 89. SoCalGas has engaged in recurring violations of Commission orders in D. 22-12-055 by
4 generally conducting Phase One in a manner which limited study modeling and outcomes
5 that improve environmental justice.

6 90. SoCalGas's exclusion of appropriate regional representation limited critical, early-stage
7 input that could have changed the course of local impacts studies and selection of studied
8 pipeline routes.

9 91. SoCalGas violated the Commission orders in D. 22-12-055 by recording for memorandum
10 account treatment study costs which exclude required input from potentially impacted
11 communities.

12 **Scoping Information**

13 92. CBE is filing this complaint as an adjudicatory complaint and believes that hearings may
14 be necessary.

15 93. The proposed schedule for resolving the adjudicatory complaint within 12 months is as
16 follows:

- 17 a. Prehearing Conference: 50 to 65 days from the date of the filing of the Complaint.
- 18 b. Hearing: 75 to 90 days from the date of the filing of the Complaint.

19 **Prayer for Relief**

- 20 94. Consequently, CBE respectfully requests that the Commission:
- 21 a. Find and declare that SoCalGas violated Code Section 702 by failing to comply
22 with the Decision and orders of the Commission.
 - 23 b. Find that to comply with the Decision, SoCalGas must identify and engage
24 communities and organizations serving communities along the proposed pipeline
25 route; allowing these invitees the opportunity to receive information and engage in
26 the same manner as the organizations that were invited to the community group
27 process.
 - 28 c. Find that, given the central importance of outreach and community engagement to

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

completion of Phase I, the Commission will not accept an application from SoCalGas to begin consideration of Phase II prior to compliance with the Decision.
d. Appoint a Commission staff person to oversee SoCalGas’s compliance with D. 22-12-055.

Dated: November 27, 2024

Respectfully submitted,

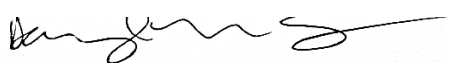
/s/Theo Caretto

Theodore Caretto
Shana Lazerow
Communities for a Better Environment
6325 Pacific Blvd.
Ste. 300
Huntington Park, CA 90255
Email: theodore@cbeocal.org
slazerow@cbeocal.org

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Verification

I, Darryl Molina Sarmiento, am an officer of complainant organization herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true and my of my own knowledge, except as to maters which are herein stated on information and belief, and as to those matters I believe them to be true. I declare under penalty of perjury that the forgoing is true and correct. Executed on November 21, 2024 at Huntington Park, California.



/s/Darryl Molina Sarmiento