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A2209006

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Gas Company (U904G), San Diego Gas & Electric Company (U902), Pacific Gas and Electric Company (U39G) and Southwest Gas Corporation (U905G) to Establish Hydrogen Blending Demonstration Projects.

Application 22-09-006

**E-MAIL RULING DIRECTIVES AND
GUIDANCE FOR FINAL BRIEFING**

Dated March 9, 2026, at San Francisco, California.

/s/ CHARLES FERGUSON

Charles Ferguson
Administrative Law Judge

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Sent: Monday, March 9, 2026 10:06 AM

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Subject: A.22-09-006; Email ruling directives and guidance for final briefing

This ruling provides both directions and guidance regarding the preparation and filing of closing briefs for this proceeding.

1. The length of each party's Opening Brief shall not exceed 50 pages, and the length of each party's Reply Brief shall not exceed 25 pages. Briefs shall be doubled spaced and typeface shall be no smaller than 13 points. Parties are encouraged to confer with one another so as not to duplicate each other's arguments; a simple statement of joinder is all that is needed to indicate support for another party's argument(s). The Commission prefers briefs to be additive rather than duplicative.
2. Opening Briefs shall be filed no later than close of business, May 4, 2026. Reply Briefs shall be filed no later than close of business May 25, 2026. One hard copy of each brief shall be delivered to ALJ Ferguson at the Commission's 505 Van Ness Avenue office in San Francisco at the time of filing.
3. Parties are encouraged to keep in mind the scope of the proceeding – this is an application proceeding for five individual pilot projects, not an industry-wide rule making. The Commission will eventually rule on whether one or more of the proposed pilots may proceed. Arguments for a sweeping, industry-wide ruling on all five proposed pilots or based on industry-wide, long-range, financial projections, one way or the other regarding the hydrogen industry, will be assessed in light of the Commission's prior statements and rulings regarding the scope of this proceeding. Those parties choosing to file briefs are encouraged to relate their arguments to the specific issues identified by the Assigned Commissioner in her most recent scoping memo.
4. The Parties choosing to submit briefs are also encouraged to provide specific citations to the evidentiary record and legal authorities when appropriate. Furthermore, if AI software is employed in preparing any brief or portion of a brief, the representative of the party for whom the brief is submitted must verify the accuracy of all citations provided in the brief and so state at the conclusion of the brief.
5. The Parties submitting briefs are also encouraged to provide specific citations to evidence of how an individual proposed project will or

will not add to the body of existing knowledge regarding the blending of natural gas and hydrogen.

6. Parties submitting briefs are encouraged to lay a foundation for relevancy or irrelevancy of references to blending projects outside California to the gas infrastructure in California when arguing for or against approval of a particular proposed project.
7. Ensuring the public's safety is an important and ever-present concern for the Commission; it is a topic that should be addressed by the applicants and intervenors alike in their briefs with appropriate citations to record evidence.

Accordingly, it is ordered that the Parties choosing to submit closing briefs in this proceeding shall follow the directives and guidance above.

THE DOCKET OFFICE SHALL FORMALLY FILE THIS RULING.

Dated: March 9, 2026, at San Francisco, California.

Charles Ferguson
Administrative Law Judge
California Public Utilities Commission