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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Adopt Biomethane Standards and Requirements, Pipeline Open Access Rules, and Related Enforcement Provisions.	Rulemaking 13-02-008 (R.13-02-008)

COMMENTS OF ENERGY INDEPENDENCE NOW IN SUPPORT OF PETITION FOR MODIFICATION OF DECISION 22-12-057

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March 3, 2026

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Energy Independence Now ("EIN") respectfully submits these comments in support of the Petition for Modification filed February 3, 2026 by Southern California Gas Company, San Diego Gas & Electric Company, and Southwest Gas Corporation ("Joint Movants") in Rulemaking 13-02-008.

EIN supports modifying Decision 22-12-057 to remove the requirement that the utilities complete a 0.1%–5% hydrogen blending demonstration in medium-pressure distribution systems prior to proposing for the Commission's consideration a maximum 5% hydrogen injection standard.

Since issuance of D.22-12-057 in 2022, the technical, operational, and regulatory landscape has materially evolved. Substantial additional research, demonstration, and real-world operational experience—both domestically and internationally—now exist regarding hydrogen blending in natural gas distribution systems. Multiple utilities have successfully implemented blends at or above the 5% level without adverse safety or reliability impacts.

Other jurisdictions have already moved forward with defined hydrogen blending parameters in distribution systems, including in North America, Europe, Australia, and New Zealand. California's continued leadership in clean energy depends not only on ambitious targets but also on the timely modernization of regulatory frameworks when the evidentiary record supports doing so.

The purpose of the demonstration requirement in D.22-12-057 was to address then-existing knowledge gaps. The Petition credibly explains that those gaps have narrowed considerably. Where the record has matured, regulatory processes should evolve accordingly.

Requiring completion of a sub-5% live demonstration before the Commission may even consider a conservative maximum 5% standard would impose delay without a commensurate public safety or reliability benefit. The Petition does not seek immediate operational deployment of a systemwide blending program. It seeks only to allow the Commission to evaluate a narrowly scoped, conservative standard based on an expanded evidentiary record.

California has consistently sought to lead in clean energy innovation while maintaining rigorous safety oversight. Allowing timely consideration of a maximum 5% hydrogen injection standard for medium-pressure distribution systems is consistent with both objectives.

EIN offers these comments to assist the Commission in developing a complete and up-to-date evidentiary record on hydrogen blending in gas distribution systems.

For these reasons, EIN respectfully urges the Commission to grant the Petition for Modification.

Dated: March 3, 2026

Respectfully submitted,

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