

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Adopt  
Biomethane Standards and Requirements,  
Pipeline Open Access Rules, and Related  
Enforcement Provisions.

R.13-02-008  
(Filed February 13, 2013)

**REPLY OF SOUTHERN CALIFORNIA GAS COMPANY, SAN DIEGO GAS &  
ELECTRIC COMPANY, AND SOUTHWEST GAS CORPORATION TO RESPONSES  
TO PETITION FOR MODIFICATION OF DECISION 22-12-057**

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**I. INTRODUCTION**

Pursuant to Rule 16.4 of the Rules of Practice and Procedure (Rules) of the California Public Utilities Commission (CPUC or Commission) and authorization granted by Administrative Law Judge Sasha Goldberg by email on March 10, 2026, Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), and Southwest Gas Corporation (Southwest Gas; together with SoCalGas and SDG&E, Joint Petitioners) respectfully submit this Reply to Responses to Petition for Modification of Decision 22-12-057 (Reply).<sup>1</sup>

Responses were timely filed to the Petition for Modification of Decision 22-12-057 (Petition) by the Public Advocates Office of the Commission (Cal Advocates), Environmental Defense Fund (EDF), Sierra Club, Leadership Council for Justice and Accountability (LCJA), California Hydrogen Coalition, and Energy Independence Now, with the latter two parties supporting the Petition and the former four parties opposing it. Opposition to the Petition is grounded unabashedly in ideology.<sup>2</sup> In this proceeding, now,<sup>3</sup> LCJA insists that a hydrogen injection standard can only be considered after the demonstrations

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<sup>1</sup> Pursuant to Rule 1.8(d), SoCalGas is authorized to file this document on behalf of Joint Petitioners.

<sup>2</sup> See, e.g., EDF Response at 1-2.

<sup>3</sup> In response to the proposed decision ordering the pilots, LCJA and Sierra Club argued, “The Proposed Decision errs by unreasonably directing utilities to propose hydrogen blending pilots without considering if the potential benefits of these pilots justifies their high costs.” Sierra Club, Leadership Council for Justice and Accountability, and Food & Water Watch Comments on Proposed Decision (Nov. 30, 2022) at 2. EDF advocated the Commission first determine the cost-effectiveness of

ordered to be proposed in Decision 22-12-057 (Decision) are executed;<sup>4</sup> but, in Application 22-09-006 (Hydrogen Blending Proceeding), LCJA and other parties adamantly oppose approving the demonstration projects proposed pursuant to the Decision.<sup>5</sup> The reasons are the same: the parties do not support hydrogen blending into the existing natural gas system as a decarbonization pathway—notwithstanding its specific identification in the California Air Resources Board’s 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan), which is the state’s legally mandated comprehensive strategy for how California can achieve its greenhouse gas emissions reduction goals.<sup>6</sup> In fact, the Scoping Plan includes hydrogen blending among its “Actions for the Scoping Plan Scenario: AB 32 GHG Inventory Sectors:”<sup>7</sup>

<b>Sector</b>	<b>Action</b>	<b>Statutes, Executive Orders, Other Direction, Outcome</b>
Low Carbon Fuels for Buildings and Industry	<p>In 2030s, biomethane blended in pipeline.</p> <p>Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040.</p> <p>In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.</p>	<p>Reduce demand for fossil energy and GHGs, and improve air quality.</p> <p>AB 197: direct emissions reductions for sources covered by the AB 32 Inventory.</p>

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hydrogen blending before considering whether it’s an appropriate and reasonable step for core and non-core customers. Comments of Environmental Defense Fund on Proposed Decision Directing Pilot Project to Further Evaluate and Establish Pipeline Injection Standards for Renewable Hydrogen (November 30, 2022) at 7-8.

<sup>4</sup> LCJA Response at 10-12.

<sup>5</sup> *See, e.g.*, A.22-09-006, Joint Motion to Dismiss (July 15, 2024). Because parties oppose the demonstrations, they additionally cannot identify any prejudice if the Petition were granted. Their success in the Hydrogen Blending Proceeding could result in the same circumstance—the Commission might order Joint Petitioners to propose a renewable hydrogen injection standard for its consideration rather than ordering new demonstration projects to be proposed.

<sup>6</sup> The Scoping Plan is mandated by Assembly Bill (AB) 32 and was adopted through an extensive and rigorous process involving public workshops, community meetings, peer review, and public comment.

<sup>7</sup> California Air Resources Board 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan) at 78 (citations omitted), available at: [https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp\\_1.pdf](https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf).

The Commission has been actioning the call to blend biomethane into natural gas pipelines,<sup>8</sup> and its evaluation of at least one dedicated hydrogen pipeline is underway.<sup>9</sup> But consideration of hydrogen blending in natural gas pipelines has largely been stalled since the Commission initially announced its intention in 2018 to “consider issues... that pertain to the safe, cost-effective development of other renewable gases, such as renewable hydrogen.”<sup>10</sup> Accepting opposing parties’ position here would continue to hinder that effort.

The Commission’s intention for Phase 4 of this proceeding was clear: “This proceeding will provide the opportunity to expand hydrogen use to offset the use of fossil fuels by establishing standards and interconnection protocols for injecting renewable hydrogen into natural gas pipelines.”<sup>11</sup> The Commission sought to advance its inquiry by inviting Joint Petitioners multiple times to propose a hydrogen injection standard.<sup>12</sup> However, at those times, Joint Petitioners were not able to do so. Instead, Joint Petitioners advocated to demonstrate hydrogen blending to acquire additional knowledge prior to proposing an injection standard.<sup>13</sup> Accordingly, the resulting Decision does not directly address the purpose of Phase 4, but it defines a path to put Joint Petitioners in the position to propose a renewable

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<sup>8</sup> See, e.g., Resolution G-3612 (Jan. 30, 2025) (approving the first biomethane procurement contract under D.22-02-025) and (Proposed) Decision Implementing Changes to the Renewable Gas Standard Program and Modifying Renewable Gas Procurement Plans (Mar. 6, 2026) (proposing significant changes to biomethane procurement program created under D.22-02-025 to help increase renewable natural gas volumes while lowering costs).

<sup>9</sup> See A.24-12-011, *Application of Southern California Gas Company for Authorization to Implement Revenue Requirement for Costs to Enable Commencement of Phase 2 Activities for Angeles Link*.

<sup>10</sup> Assigned Commissioner’s Amended Scoping Memo and Ruling (July 5, 2018) at 7.

<sup>11</sup> Assigned Commissioner’s Scoping Memo and Ruling Opening Phase 4 of Rulemaking 13-02-008 (Phase 4 Scoping Memo) at 1.

<sup>12</sup> The first directive was issued in the Phase 4 Scoping Memo (“Within 12 months of this Ruling... the Joint Utilities shall submit an Application with the following proposed additions or revisions to the Standard Renewable Gas Interconnection Tariff... (b) a Preliminary Renewable Hydrogen Injection Standard...”). Phase 4 Scoping Memo at 12. Moreover, a later ruling affirmed that the questions posed in the Phase 4 Scoping Memo, to the extent they encompassed policy recommendations, should be considered in this proceeding rather than in the application proceeding. Administrative Law Judge’s Ruling Directing Joint Utilities and Other Parties to File Comments in this Proceeding (February 3, 2021) at 2-3. In a July 18, 2022 ruling, parties were invited to comment on the U.C. Riverside Study, including what a safe injection standard for hydrogen might be, if warranted. Administrative Law Judge’s Ruling Seeking Comments Regarding Continued Biomethane Procurement Reporting and Regarding U.C. Riverside Safe Hydrogen Injection Study (Jul. 18, 2022) at 4.

<sup>13</sup> D.22-12-057 at 19.

hydrogen injection standard for the Commission’s consideration. Many years have lapsed, and now, as a result of, *inter alia*, the studies, demonstrations, and operationalization described in the Petition and supporting declaration, the impediment to advancing the Commission’s initial inquiry—the inability of Joint Petitioners to propose an injection standard—has changed with respect to the Decision’s requirement to demonstrate 0.1–5% hydrogen blends in the medium-pressure distribution system (i.e., 60 psig or less). Accordingly, the Petition provides the Commission a refreshed opportunity to return to its original directive now that changed circumstances allow Joint Petitioners to respond to the invitation to “propose a Preliminary Injection Standard.”<sup>14</sup> Returning to that inquiry does not presuppose the appropriateness of any particular level of renewable hydrogen blend at all, just as the Phase 4 Scoping Memo did not presuppose any; it merely allows a proposal to be made for the Commission’s consideration—something the Commission sought to do in 2019.

Contrary to Cal Advocates’ concern, there is no issue of putting the cart before the horse.<sup>15</sup> The Phase 4 Scoping Memo provided that safety and policy issues related to adopting a hydrogen injection standard would be considered in connection with evaluating a proposed standard. It contemplated “the new phase of this proceeding will establish injection standards and interconnection protocols for renewable hydrogen connecting to the natural gas pipeline system to ensure safety and integrity of the gas delivery system and compatibility with end-uses”<sup>16</sup> and further provided that “the Commission’s determination of an appropriate standard for injection of hydrogen will consider both potential environmental benefits and potential impacts on ratepayers.”<sup>17</sup> These considerations—safety, gas system integrity, end-use compatibility, environmental benefits, and ratepayer impacts—were planned to be evaluated *in conjunction with* determining an appropriate hydrogen injection standard; they do not foreclose consideration of a renewable hydrogen injection standard altogether (indeed, these are the same concerns opponents of the Petition raised in Phase 4 of this proceeding, raise now in this proceeding and the Hydrogen Blending Proceeding, and can raise again when the Commission considers a proposed injection

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<sup>14</sup> Phase 4 Scoping Memo at 8.

<sup>15</sup> Cal Advocates Response at 5.

<sup>16</sup> Phase 4 Scoping Memo at 7.

<sup>17</sup> Phase 4 Scoping Memo at 9.

standard).<sup>18, 19</sup> Parties should not be permitted at this stage to circumvent the proposal of an injection standard altogether by insisting their concerns warrant summary judgment.

Opposing parties also misconstrue the Petition. The intent of the Petition is to alert the Commission that Joint Petitioners can now do something they previously indicated they could not do—respond to the Commission’s initial ruling in 2019 to propose a preliminary renewable hydrogen injection standard for the Commission’s evaluation. Because Joint Petitioners could not previously propose a standard for the Commission’s consideration, the Decision charts a path to put Joint Petitioners in the position of answering the Commission’s initial call, namely it orders Joint Petitioners to propose demonstration projects to acquire the knowledge they said they needed to propose an injection standard. But circumstances have now changed—Joint Petitioners are able to propose a renewable hydrogen injection standard. Given this changed circumstance, the Petition provides the Commission with optionality it did not have when it issued the Decision. Under the current framework, a renewable hydrogen injection standard would not be proposed until after the demonstrations are executed—which could be many years down the road given one of the proposals is a 10-year project<sup>20</sup>—but the Petition provides the option to advance that consideration without unnecessary delay. The Commission would thus have numerous options: it could commence its consideration of a low-level renewable hydrogen injection standard (0.1-5% by volume for the medium-pressure distribution system) while the demonstrations proposed in the Hydrogen Blending Proceeding are under way, and the demonstrations can inform its

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<sup>18</sup> D.22-12-057 at 19-20 (summarizing Phase 4 party comments). *See also, e.g.*, Comments of Environmental Defense Fund on UC Riverside Safe Hydrogen Injection Study at 3, 5.

<sup>19</sup> To the extent the parties raise broad issues pertaining to hydrogen blending and not specifically in relation to any of the proposed projects, these issues are not within the scope of the Hydrogen Blending Proceeding. ALJ Ferguson’s recent ruling confirms that broad, policy-based issues would not be considered in that proceeding. (“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.”) A.22-09-006, Email Ruling - Directives and Guidance for Final Briefing (Mar. 9, 2026),

<sup>20</sup> A.22-09-006, Assigned Commissioner’s Scoping Memo and Ruling (Jun. 12, 2025) at 6-8. The Commission could, however, order proposal of a low-level renewable hydrogen injection standard when the projects demonstrating 0.1-5% hydrogen by volume are completed.

consideration; it could determine the Orange Cove demonstration need not occur;<sup>21</sup> or it could stay the course and commence its consideration of a renewable hydrogen injection standard after the demonstrations are complete. All three options allow the Commission to advance its 2019 proposal, but at different times. Opponents of the Petition, however, seek to remove all the Commission’s options, maintaining a hydrogen injection standard should not be proposed or considered now, and the demonstrations proposed pursuant to the Decision should not be authorized—i.e., no hydrogen injection standard should ever be evaluated.

As discussed below, opponents of the Petition have failed to raise any convincing legal or factual reason why the Petition should not be granted and the Commission should not continue to advance its consideration of a renewable hydrogen injection standard.

## **II. DISCUSSION**

### **A. The Petition Is Timely**

Rule 16.4(d) provides that if a petition for modification is filed and served after one year of the effective date of a decision, the “petition must explain why the petition could not have been presented within one year of the effective date of the decision.” The Petition does just that, explaining that the confluence of studies, demonstrations, and operationalization of hydrogen blending both nationally and globally has provided Joint Petitioners with sufficient information to answer the Commission’s initial question of proposing an injection standard for its consideration. Parties contend the Petition is untimely because Joint Petitioners have not justified filing it after January 9, 2024, i.e., the first anniversary of the effective date of the Decision, on the basis that some of the studies and activities described in the Compendium Report existed at that time.<sup>22</sup> These parties essentially ask the Commission to determine the world is flat because some of the evidence to the contrary is too old. In doing so, they ignore several material facts.

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<sup>21</sup> Only one of the projects proposed in the Hydrogen Blending Proceeding could even be impacted by the Petition—SoCalGas’s Orange Cove proposal—and that would only be if the Commission determines it would be superfluous to demonstrate 0.1-5% given that Joint Petitioners can now propose a renewable hydrogen injection standard up to 5% for the medium-pressure distribution system.

<sup>22</sup> LCJA Response at 2; Cal Advocates Response at 6; Sierra Club Response at 3-5.

First, while there have been numerous studies, demonstrations, and operationalization of hydrogen blending that have occurred in the last few years, focus on the dates they occurred obfuscates the salient change warranting modification of the Decision. It is not merely that these individual studies and activities occurred, but rather their impact on Joint Petitioners: Joint Petitioners now are able to propose a low-level renewable hydrogen injection standard.<sup>23</sup> This is something they previously were not able to do, i.e., a material change. As the Decision describes, six parties supported a 5% hydrogen injection standard based on the U.C. Riverside Study in 2022, but Joint Petitioners recommended demonstration at that time.<sup>24</sup> Had Joint Petitioners proposed an injection standard when they had been asked, the Decision almost certainly would have been different—consistent with EDF’s position that modification requires a showing of “significant change in material facts that undermines the factual premise of the decision.”<sup>25</sup> And even if not, it is nevertheless appropriate for the Commission to be informed of the changed circumstance.

Second, as the Petition describes, there is no single study, demonstration, or operationalization of hydrogen blending that has prompted the changed circumstance.<sup>26</sup> The Commission should be wary if there were—any single study could have material flaws, but a body of evidence allows the separation of statistical flukes, biased analyses, and context-specific results. Moreover, individual studies may not provide the fulsome picture that multiple studies in concert can. Joint Petitioners have appropriately taken a conservative approach to this endeavor and waited for sufficient information to respond to the Commission’s request to propose an injection standard. LCJA may protest a body of evidence as too “nebulous,”<sup>27</sup> but ultimately each system operator has to be convinced sufficiently to propose a change to their system. It is evident

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<sup>23</sup> Cal Advocates incorrectly states Joint Petitioners contend the “*Commission* now has enough information to set the hydrogen injection standard range (0.1% to 5%) identified in the Decision without a fuller review by other parties and the Commission.” Cal Advocates Response at 5. This is incorrect. As noted herein, it is that it is *Joint Petitioners* who have enough information to *propose* a hydrogen injection standard for the Commission’s consideration. Whether the supporting evidence is sufficient should be evaluated in connection with assessing whether the proposed injection standard should be authorized.

<sup>24</sup> D.22-12-057 at 18-19.

<sup>25</sup> EDF Response at 8 (quotations and citations omitted).

<sup>26</sup> Petition for Modification (Petition) at 11.

<sup>27</sup> LCJA Response at 3.

that the Commission understood this, too; it did not order a staff proposal<sup>28</sup> to propose an injection standard—any proposal had to come from the gas system operators themselves.

Third, the procedural history of the proceeding establishes that the Decision does not directly address the purpose of Phase 4 of the proceeding: to establish an injection standard and interconnection protocols for renewable hydrogen. The Commission invited Joint Petitioners to propose such an injection standard. However, Joint Petitioners did not have enough information at the time to do so, and thus there was no proposal for the Commission to consider. Accordingly, in order to enable Joint Petitioners to propose an injection standard for the Commission’s consideration, and consistent with Joint Petitioners’ position to demonstrate hydrogen blending,<sup>29</sup> the Decision ordered Joint Petitioners to propose demonstration projects to acquire the knowledge they needed to return to the original question. The circumstance underlying the Decision has since changed in part—Joint Petitioners now have the necessary information to propose a low-level renewable hydrogen injection standard for the medium-pressure distribution system. This allows the Commission to return to its original inquiry. As discussed below, the Commission retains the option to authorize demonstration of 0.1-5% hydrogen blending, but it is no longer a condition precedent to Joint Petitioners proposing a preliminary injection standard for the Commission’s consideration.

Cal Advocates further argues that the Compendium Report, as a product of the Decision, should not be considered to be new information warranting a modification of the Decision.<sup>30</sup> This argument is not convincing here given the specific purpose of Phase 4 (namely, by having Joint Petitioners propose a renewable hydrogen injection standard for Commission consideration) and the means through which the Commission sought to accomplish that purpose (by having Joint Petitioners conduct demonstration projects to acquire knowledge to enable such a proposal). While five years have passed since the Commission initially posed the request to Joint Petitioners, the fact remains that Joint Petitioners can now respond—a material changed circumstance that might have resulted in a different decision. Granting the Petition affords the Commission that

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<sup>28</sup> In contrast, the Phase 4 Scoping Memo ordered a staff proposal on issues relating to adopting biomethane procurement targets or goals for each investor-owned utility. Phase 4 Scoping Memo at 9-11. *See also* Administrative Law Judge’s Ruling Directing Parties to File Comments on Phase 4A Staff Proposal and Related Questions (Jun. 3, 2021) (attaching draft Staff Proposal).

<sup>29</sup> D.22-12-057 at 19.

<sup>30</sup> Cal Advocates Response at 6.

option.

Seemingly to limit the Commission’s options instead, LCJA attempts to impose an inapplicable standard on the Petition, citing D.18-09-005 for the proposition that “modifying an existing decision is an extraordinary remedy that must be exercised with care to keep with the principles of *res judicata*.”<sup>31</sup> While there is no Decision 18-09-005, the quoted language is found in D.22-04-043, and that decision makes clear that LCJA’s selective quotation does not impose any higher standard for petitions for modification outside that set forth in Rule 16.4. In D.22-04-043, the Commission affirmed the correct standard for a petition for modification—Rule 16.4—and noted that the Commission will not consider a petition for modification which merely seeks to relitigate *res judicata* issues, i.e., issues that were already decided.<sup>32</sup> Here, the issue—an appropriate renewable hydrogen injection standard—was neither litigated nor decided because Joint Petitioners never proposed a standard for the Commission’s consideration. As a result of having no proposal to consider, the Commission deferred consideration of the issue and laid the groundwork for a path—the demonstration projects—that would allow the issue to become ripe for its consideration and ultimately a decision. And now, with the changed fact that Joint Petitioners can propose a low-level hydrogen injection standard for the medium-pressure distribution system for the Commission’s consideration, the issue can be addressed directly for the first time.

### **B. The Petition Is Amply Supported**

As California Hydrogen Coalition notes, “the safety case for low-level blends has advanced” since the Decision was issued.<sup>33</sup> Energy Independence Now acknowledges that the purpose of the Decision’s demonstration requirement was to address then-existing knowledge gaps—which at the time prevented Joint Petitioners from proposing an injection standard they deemed to be suitable for their individual systems—and that many of those knowledge gaps have narrowed considerably.<sup>34</sup> But opponents of the Petition encourage the Commission to disregard these facts, and they moreover ignore that the Petition pertains only to a portion of the Decision’s

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<sup>31</sup> LCJA Response at 2.

<sup>32</sup> D.22-04-043 at 2-3.

<sup>33</sup> California Hydrogen Coalition Response at 1.

<sup>34</sup> Energy Independence Now Response at 1-2.

requirement to demonstrate hydrogen blending, i.e., 0.1-5% in the medium-pressure distribution system. They generically point to the Compendium Report to show that more study regarding hydrogen blending is still necessary, but they ignore that low levels in the medium-pressure distribution system, i.e., 5% or lower and less than 60 psig, are generally not expected to have an impact on steels, pipeline plastics, seals, gaskets, etc.<sup>35</sup> This and other information in the Compendium Report, combined with the U.C. Riverside Study and the demonstrations and operationalization of blending, allow Joint Petitioners to finally be in the position to propose a low-level renewable hydrogen injection standard for the medium-pressure distribution system. Joint Petitioners agree that more information is necessary for higher blending levels and systems with higher operating pressures.

Cal Advocates, LCJA, EDF, and Sierra Club argue for various reasons that the Compendium Report and the Declaration of Katrina Regan fail to provide support for the Commission to consider a proposed low-level hydrogen injection standard.<sup>36, 37</sup> EDF argues the Compendium Report is full of opinion, not fact.<sup>38</sup> LCJA argues that some of the studies are not publicly available and thus cannot be vetted.<sup>39</sup> Cal Advocates, LCJA, and Sierra Club further allege they have been deprived of due process because they have not been provided an opportunity to vet the studies in the Compendium Report.<sup>40</sup> These arguments ignore the process

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<sup>35</sup> Compendium Report at 3-4, 13-15.

<sup>36</sup> Cal Advocates Response at 5; EDF Response at 6; Sierra Club Response at 6-7; LCJA Response at 7-10. LCJA also misrepresents Joint Petitioners' statement about Consensus Engineering Requirements. The Petition says they have been published to advise the transition from ASME B31.12 to ASME B.31.8. Petition, Attachment A-1 at 3. LCJA's characterization that Joint Petitioners have alleged Consensus Engineering Requirements are an established standard for hydrogen piping is false. LCJA Response at 9-10. And while Sierra Club is correct that the Colorado demonstration identified in the Compendium Report ultimately was canceled, the fact remains that the many other demonstrations identified did proceed. Sierra Club Response at 6-7, n.20.

<sup>37</sup> LCJA additionally argues that the Compendium Report does not sufficiently establish the criteria set forth in Ordering Paragraph 7 of the Decision for the demonstrations ordered to be proposed. LCJA Response at 11-12. But these are criteria for the demonstrations to meet; they are not necessarily necessary in order to propose a hydrogen injection standard for the Commission's consideration. For example, one criterion is for each demonstration to contain "an independent research plan for assessment, measurement, monitoring, and reporting through an independent party." D.22-12-057 at 70 (Ordering Paragraph (OP) 7(I)).

<sup>38</sup> EDF Response at 6.

<sup>39</sup> LCJA Response at 3.

<sup>40</sup> Cal Advocates Response at 7; Sierra Club Response at 6; LCJA Response at 3-4.

laid out in the Phase 4 Scoping Memo for how the Commission intended to evaluate a proposed renewable hydrogen injection standard. The Commission did not intend to evaluate all the available information on hydrogen blending first and then develop an appropriate hydrogen injection standard. Instead, as laid out above, the Commission left it for the system operators to propose an appropriate injection standard for the Commission to then evaluate with appropriate context from studies, etc. The Phase 4 Scoping Memo specifically identifies the concerns identified in responses to the Petition—safety, gas system integrity, end-use compatibility, environmental benefits, and ratepayer impacts—and provides they are to be evaluated *in conjunction with* determining an appropriate hydrogen injection standard. That same process would occur if the Petition is granted and Joint Petitioners propose an injection standard for evaluation.<sup>41</sup> There is no due process violation.

For the same reason, Sierra Club’s and LCJA’s contention that the Petition limits participation, specifically of Orange Cove United, who is a party in the Hydrogen Blending Proceeding, is without merit.<sup>42</sup>

**C. The Petition Does Not Seek to Withdraw or Otherwise Terminate the Orange Cove Project Proposed in the Hydrogen Blending Proceeding**

It is disingenuous of opponents of the Petition to argue the filing of the Petition itself acknowledges there is no need for the demonstrations proposed in the Hydrogen Blending Proceeding.<sup>43</sup> First, only one of the five demonstrations proposed in the Hydrogen Blending

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<sup>41</sup> LCJA, EDF, and Sierra Club also take the unsupported position that the Petition is duplicative of the issues in the Hydrogen Blending Proceeding. This is most certainly not the case because the issues scoped into the Hydrogen Blending Proceeding are narrowly circumscribed to the specific projects proposed. The five overarching questions scoped there are whether the demonstrations conform to regulatory requirements, are useful and well designed, are prudent and safe, and are equitable. *See* A.22-09-006 Assigned Commissioner’s Scoping Memo and Ruling at 11-13.

<sup>42</sup> Even more, any entity could have sought party status in this proceeding pursuant to Rule 1.4 to respond to the Petition. As for Orange Cove United specifically, it is unclear whether (a) their interests extend beyond the Hydrogen Blending Proceeding in which a demonstration has been proposed for the city of Orange Cove and (b) they would provide any comment separate from LCJA given their participation in the Hydrogen Blending Proceeding has been joint with LCJA. *See, e.g.,* Orange Cove United and Leadership Counsel for Justice and Accountability’s Response to Joint Motion to Dismiss; Orange Cove United and Leadership Counsel for Justice and Accountability’s Rebuttal of Response of Southern California Gas Company to Appendix B of Assigned Commissioner’s Scoping Memo and Ruling.

<sup>43</sup> *See, e.g.,* Sierra Club Response at 8.

Proceeding—the Orange Cove proposal—could even be impacted if the Petition were granted.<sup>44</sup> Second, the Commission could approve all of the demonstrations proposed in the Hydrogen Blending Proceeding while also commencing its consideration of a proposed low-level hydrogen injection standard for the medium pressure distribution system.

Joint Petitioners continue to support the Orange Cove proposal, which seeks to demonstrate blending 0.1-5% in the medium-pressure distribution system. If the Commission agrees it is prudent to conduct the demonstration, SoCalGas is ready to do so. There is certainly value in a demonstration and developing operational experience. However, Joint Petitioners no longer believe it is necessary to conduct that demonstration *prior* to proposing a low-level injection standard for the medium-pressure distribution system. In the interest of transparency, and because it would support affordability, Joint Petitioners present the option to the Commission to resume its inquiry from 2019 without first completing demonstration of low-level blending in the medium-pressure distribution system. Ultimately, it is up to the Commission to determine whether the Orange Cove demonstration is warranted prior to considering a low-level renewable hydrogen injection standard.

### **III. CONCLUSION**

The aim of opponents of the Petition is to halt the Commission’s consideration of renewable hydrogen blending in the natural gas distribution system, notwithstanding its inclusion in the state’s decarbonization strategy. The same parties want neither the demonstration projects proposed in the Hydrogen Blending Proceeding pursuant to the Commission’s express order in the Decision to proceed, nor for the Commission to consider a renewable hydrogen injection standard. Notwithstanding their positions, the Commission should not prematurely abandon its consideration of a renewable hydrogen injection standard without further diligence. The Petition

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<sup>44</sup> SoCalGas’s two proposals would demonstrate 0.1-5% in the distribution system and 5-20% in the distribution system; SDG&E’s proposal would demonstrate polyethylene pipe offline (i.e., disconnected from the existing natural gas system); Southwest Gas’s proposal would demonstrate hydrogen blends at high altitude and cold climate; and Pacific Gas and Electric Company’s proposal would demonstrate 5-20% blends in offline transmission pipeline. A.22-09-006 Assigned Commissioner’s Scoping Memo and Ruling (June 12, 2025) at 6-10.

