

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



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In The Matter of the Application of Southern California Gas Company (U904G) for Authorization to Implement Revenue Requirement for Costs to Enable Commencement of Phase 2 Activities for Angeles Link.

Application 24-12-011
(Filed December 20, 2024)

**THE UTILITY CONSUMERS' ACTION NETWORK COMMENTS ON THE
PROPOSED DECISION DENYING SOUTHERN CALIFORNIA GAS COMPANY'S
REQUEST FOR COST RECOVERY FROM RATEPAYERS
FOR PHASE 2 ACTIVITIES FOR ANGELES LINK PROJECT**



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Dated: April 9, 2026

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

Order Instituting Rulemaking to
Consider New Approaches to
Disconnections and Reconnections to
Improve Energy Access and Contain
Costs.

Rulemaking. 18-07-005

**THE UTILITY CONSUMERS’ ACTION NETWORK COMMENTS ON THE
PROPOSED DECISION DENYING SOUTHERN CALIFORNIA GAS COMPANY’S
REQUEST FOR COST RECOVERY FROM RATEPAYERS
FOR PHASE 2 ACTIVITIES FOR ANGELES LINK PROJECT**

Pursuant to California Public Utilities Commission (“Commission”) Rule of Practice and Procedure 14.3, the Utility Consumers’ Action Network (“UCAN”) respectfully submit these Comments on the March 20, 2026, Proposed Decision Denying Southern California Gas Company’s Request for Cost Recovery from Ratepayers for Phase 2 Activities for Angeles Link Project (“PD”).¹

I. THE PD ACCURATELY INTERPRETS LAWS AND REGULATIONS THAT REQUIRE THE COMMISSION TO DENY THE APPLICATION.

UCAN supports the findings, conclusions, and orders in the PD. The PD accurately determines that (1) Commission can address Phase 2A before the Phase 1 Compliance Application, (2) it is not reasonable for SoCalGas to recover the cost of Phase 2 Activities from its natural gas ratepayers, and (3) the project must be constructed, used, and useful and dedicated to public use before being considered as a gas plant.

¹ A.12-12-011, Proposed Decision Denying Southern California Gas Company’s Request for Cost Recovery from Ratepayers for Phase 2 Activities for Angeles Link Project (“PD”) (March 20, 2026), <https://docs.epuc.ca.gov/PublishedDocs/Efile/G000/M602/K997/602997613.PDF>.

While UCAN supports the determinations in the PD, UCAN requests minor clarifying language be added to the PD.

UCAN recommends the following update be made to clarify that the Commission has not determined whether SoCalGas's claim regarding federal funding is accurate (proposed additions to PD text are bold and underlined):

While SoCalGas ultimately declined federal funding because **SoCalGas claimed** the additional cost of complying with regulations accompanying those federal funds would not be in the ratepayers' interest, it also means that there are no federal funds to offset the proposed project.²

Next, in its briefs, UCAN expressed concerns regarding the high cost of hydrogen compared to GHG-free alternatives,³ the fact that SoCalGas's affordability claims remain unsupported and in conflict with analyses of the CPUC, CEC, and CARB,⁴ and that the cost of hydrogen should not be borne by natural gas ratepayers.⁵ UCAN also cited three statutory requirements on affordability and expressed concern that SoCalGas's application conflicts with those legal requirements as well as restrictions regarding cost-shifting among customers.⁶

As this was UCAN's express position, and well supported by its citations, UCAN requests that its contribution on affordability concerns be noted as proposed below:

Cal Advocates, CEJA/Sierra Club, EDF, **UCAN**, and TURN express concern over the Project's impacts on affordable rates.⁷

Finally, UCAN was explicit, in a similar manner, on another matter. UCAN highlighted that unless a project is built, it does not qualify as a gas plant.⁸ Accordingly, UCAN requests that its contribution on this issue be noted as proposed below:

² PD at 12.

³ UCAN Opening Brief at 11, ("the hydrogen end-uses targeted by SoCalGas are poor uses of hydrogen, can be served by more affordable GHG-free alternatives, and are unlikely attract customer interest.").

⁴ *Id* at 12-13.

⁵ *Id* at 10.

⁶ *Id* at 11-12, ("Not only would it be unfair for natural gas customers to pay for hydrogen customers' costs, but it also conflicts with statutory requirements. The Legislature has specified: that charges must be just and reasonable, (Public Utilities Code § 451),³² that rates should be as affordable as possible (Public Utilities Code § 747),³³ and that California should achieve net zero greenhouse gas emissions as soon as possible (Health and Safety Code §38562.2(c)(1)).³⁴ SoCalGas's Application conflicts with each of these.").

⁷ PD at 10.

⁸ UCAN Reply Brief at 6-7.

First, we agree with Cal Advocates, CEJA/Sierra Club, UCAN, and TURN that the Project remains in the planning stage, and may not be constructed nor dedicated to public use.⁹

Each of the requested revisions are listed in Appendix A of these comments.

II. PARTIES' WORK WITHIN THE ANGELES LINK PLANNING ADVISORY GROUP CONTRIBUTED TO THE DECISION.

In Proceeding A.22-02-007, SoCalGas's application for the Angeles Link Phase 1 memorandum account, the Commission ordered SoCalGas to organize stakeholder engagement on Angeles Link planning in the form of the Angeles Link Planning Advisory Group ("PAG").¹⁰ UCAN and other intervenors spent significant time and resources contributing to the PAG process. This participation included providing SoCalGas with detailed feedback on SoCalGas's proposed methodologies and modeling for its Angeles Link Phase 1 reports. This crucial involvement by UCAN and other intervenors was requested by the Commission in D.22-12-055:

SoCalGas shall invite parties in this proceeding to participate in the PAG, which shall meet at least quarterly, in coordination with Energy Division staff. The PAG is a useful vehicle for providing transparency into the Angeles Link planning process and providing feedback to SoCalGas on Project options and alternatives.¹¹

In addition to requesting parties' participation in the PAG, the Commission specifically granted parties the opportunity to request intervenor compensation for their PAG contributions.¹² D.22-12-055 states that intervenor compensation claims for parties' PAG work shall be filed in

⁹ PD at 11-12.

¹⁰ D.22-12-055 at 45-47.

¹¹ D.22-12-055 at 46.

¹² D.22-12-055 at 46 ("We therefore find it appropriate to allow parties in this proceeding to request compensation through the Commission's Intervenor Compensation program for their participation in the PAG, subject to the guidelines set in Public Utilities Code Sections 1801-1812 and other limitations of the program."); *See also*, D.22-12-055's at 77-78, OP 8(a), ("... parties' participation through the PAG shall be eligible for compensation through the Commission's Intervenor Compensation program for their participation in the PAG, subject to the guidelines set in Public Utilities Code Sections 1801-1812 and other limitations of the program.").

A.22-02-007 or in a successor proceeding which “may include the Phase Two proceeding” (i.e., the instant proceeding).¹³

Parties’ PAG work started at the beginning of 2023 and ran through December 2024. Because parties completed their PAG contributions more than a year after the 60-day deadline for filing intervenor compensation requests associated with D.22-12-055, the instant Phase 2 proceeding is the first opportunity that parties have had to request intervenor compensation for the extensive PAG work completed throughout 2023 and 2024.

In the instant proceeding, UCAN, the Public Advocates Office (“CalAdvocates”), and the Environmental Defense Fund (“EDF”) cite to feedback that they provided to SoCalGas during the PAG process.¹⁴ Therefore, consistent with the guidance in D.22-12-055, UCAN requests that the PD be updated to state that parties eligible for intervenor compensation may request compensation for their PAG contributions in the instant proceeding.

UCAN respectfully requests that the PD be updated to state:

Parties’ participation in, and contributions to, the Angeles Link Planning Advisory Group (“PAG”) process contributed to this decision, and parties may submit intervenor compensation requests for their contributions to the PAG with their compensation requests associated with this decision.

III. CONCLUSION

For the reasons stated above, UCAN requests (1) the addition of clarifying updates to the text of the PD, which are detailed in Appendix A, and (2) a determination that parties’ work in the Angeles Link Planning Advisory Group contributed to this decision.

¹³ D.22-12-055 at 47, footnote 85.

¹⁴ UCAN Reply Brief at 7, footnote 12; UCAN Reply Brief, Attachment 1; EDF Opening Brief at 5-6; CalAdvocates Protest at 6 and footnote 18.

Dated: April 9, 2026

Respectfully submitted,

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APPENDIX A
(Proposed revisions to the PD, additions in bold and underlined)

Note: citations from the PD have been removed from the following citations.

Dicta, page 10:

“Cal Advocates, CEJA/Sierra Club, EDF, **UCAN**, and TURN express concern over the Project’s impacts on affordable rates.”

Dicta, page 11:

“First, we agree with Cal Advocates, CEJA/Sierra Club, **UCAN**, and TURN that the Project remains in the planning stage, and may not be constructed nor dedicated to public use.”

Dicta, page 12:

“While SoCalGas ultimately declined federal funding because **SoCalGas claimed** the additional cost of complying with regulations accompanying those federal funds would not be in the ratepayers’ interest, it also means that there are no federal funds to offset the proposed project.”

Dicta, NEW:

“Parties’ participation in, and contributions to, the Angeles Link Planning Advisory Group (“PAG”) process contributed to this decision, and parties may submit intervenor compensation requests for their contributions to the PAG with their compensation requests associated with this decision.”

Finding of Fact, NEW:

[NEW] “Parties’ participation in and contributions to the Angeles Link Planning Advisory Group process contributed to this decision.”